

ESQUIRE DEPOSITION SERVICES

Page 118	Page 120
<p>13:28:14 1 the agreement of Belmac?</p> <p>2 A. No. Miss -- Mrs. Carpentier was in</p> <p>3 charge of the regulatory aspect, not of the</p> <p>4 negotiation part.</p> <p>13:28:40 5 Q. Do you know who specifically was</p> <p>6 involved with the negotiation part with respect to</p> <p>7 Belmac?</p> <p>8 A. Well, Belmac or Spain or all of the --</p> <p>9 the Spanish customers in Spain of which Belmac is</p> <p>13:29:01 10 one.</p> <p>11 Q. My question is limited to Belmac.</p> <p>12 A. My response is the same, the same as it</p> <p>13 would be for the other customers. It would be</p> <p>14 Adolfo de Basilio, Yves Liorzou, and Philippe</p> <p>13:29:28 15 Boudal, for the technical aspect.</p> <p>16 Q. And do you know with whom at Belmac --</p> <p>17 A. And before I end, if it -- if it's -- if</p> <p>18 it had to do with a form of flash tab, Bruno Delie.</p> <p>19 Q. Do you know with whom at Belmac</p> <p>13:30:02 20 Mr. Liorzou, Boudal, or de Basilio interacted to</p> <p>21 seek the change?</p> <p>22 A. No.</p>	<p>13:32:54 1 Q. Do you know who authored the document?</p> <p>2 A. That is mentioned, it's Eric Igonet.</p> <p>3 Q. And who is Mr. Igonet?</p> <p>4 And actually let me be more precise.</p> <p>13:33:11 5 Who was Mr. Igonet as of August of 2000?</p> <p>6 A. Mr. Igonet on the 22nd of August 2000</p> <p>7 was the general secretary.</p> <p>8 Q. And do you know what Mr. Igonet's duties</p> <p>9 and responsibilities as general secretary were as</p> <p>13:33:45 10 of August 2000?</p> <p>11 A. Well, as a secretary general you have to</p> <p>12 deal with everything which has to do with the legal</p> <p>13 aspect of companies in a broad sense.</p> <p>14 Q. Did Mr. Igonet report directly to you</p> <p>13:34:19 15 while you were employed at Ethypharm?</p> <p>16 A. At that moment in time?</p> <p>17 Q. Yes.</p> <p>18 A. (In English) No, no.</p> <p>19 Q. At some point while you were employed at</p> <p>13:34:47 20 Ethypharm did Mr. Igonet come to report directly to</p> <p>21 you?</p> <p>22 A. Yes.</p>
Page 119	Page 121
<p>13:30:32 1 MR. MINGOLLA: I'd like to have this</p> <p>2 marked as the next exhibit, nine.</p> <p>3 (Germain Deposition Exhibit No. 9 was</p> <p>4 marked for Identification.)</p> <p>13:30:38 5 THE WITNESS: (In French) Merci.</p> <p>6 BY MR. MINGOLLA:</p> <p>7 Q. If you could just take a moment to</p> <p>8 review Exhibit 9 while I identify it for the</p> <p>9 record, please.</p> <p>13:31:01 10 Exhibit 9 is a one-page document bearing</p> <p>11 production No. EP 007998.</p> <p>12 (Witness reviews document.)</p> <p>13 A. (In English) Okay.</p> <p>14 Q. Do you recognize that document?</p> <p>13:32:21 15 A. Directly, no. But yes, I -- I received</p> <p>16 it but I don't recall it.</p> <p>17 Q. And -- and the date of this document is</p> <p>18 August 22nd, 2000; is that correct?</p> <p>19 A. Exact.</p> <p>13:32:44 20 Q. And you are listed as having received a</p> <p>21 copy of this document; is that correct?</p> <p>22 A. That's -- that's correct.</p>	<p>13:35:00 1 Q. And when was that?</p> <p>2 Do you know?</p> <p>3 A. Before.</p> <p>4 Q. And -- and --</p> <p>13:35:14 5 A. When I arrived at -- at Ethypharm,</p> <p>6 Mr. Igonet was the financial director of the group.</p> <p>7 He was then replaced, according to my decision as a</p> <p>8 financial director, by Avi Pulan, and he took the</p> <p>9 position of general secretary, and in that capacity</p> <p>13:35:57 10 responded to the shareholders.</p> <p>11 So his function became a function of</p> <p>12 accompanying the shareholders. It wasn't an</p> <p>13 operation of the function anymore.</p> <p>14 Having said this, he maintained several</p> <p>13:36:22 15 assignments or missions with me in order to handle</p> <p>16 certain files, and that's it.</p> <p>17 Q. Now, I'd like to direct your attention</p> <p>18 to the first sentence after the title Conclusions</p> <p>19 of the work in Spain.</p> <p>13:36:41 20 And the English translation I have in</p> <p>21 front of me indicates that that first sentence</p> <p>22 says, "On the basis of work done and the document</p>

31 (Pages 118 to 121)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b-

JT-A-581

ESQUIRE DEPOSITION SERVICES

Page 122		Page 124	
13:36:57	1 handed in, the conclusions were established today 2 and transmitted by Pierre Germain." 3 Do you see that sentence? 4 A. Yes.	13:40:06	1 manufactured in Zaragoza, they mean by this to -- 2 that these activities are -- are going to 3 continue -- 4 Q. Okay.
13:37:05	5 Q. Do you have an understanding as to what 6 that references to? 7 A. Precisely, no. 8 Q. If you could review the subsequent 9 items.	13:40:15	5 A. -- at Zaragoza. 6 And the reason why I say that is, that 7 for the time where I was working there, I never 8 heard mentioning or even researching any other site 9 in Spain.
13:37:24	10 A. Globally, yes, but precisely, no. 11 Q. I don't quite understand what you mean 12 by "globally, yes." 13 Could you try to explain that to me. 14 A. Well, yes, we understand the sense of 15 this document, yes.	13:40:44	10 Q. Item No. 3 indicates, "No transfer of 11 rights on this product and others shall be made to 12 Belmac." 13 Do you have an understanding as to what 14 that item is in reference to?
13:37:44	16 If your question is geared to do I -- do 17 I have -- do I remember having seen all these 18 points in detail, my answer is no. 19 Q. The next sentence says that, As long as 20 there is not confirmation by -- well, from "A" on 21 the authorization to manufacturer in France." 22 Do you see that?	13:41:21	15 A. Well, I have the understanding that no 16 transfer of rights on this product should be made 17 to Belmac in this framework. I don't have any 18 other understanding with regards to that phrase. 19 Q. Do you recall in or around August of 20 2000 a discussion within Ethypharm about 21 transferring rights to Belmac concerning 22 Omeprazole?
Page 123		Page 125	
13:38:26	1 Do you know what the reference to "A" 2 is? 3 It's capital A. 4 A. No.	13:42:00	1 A. No. 2 Q. Item No. 4 indicates, "There is in no 3 closing of Ethypharm Spain." 4 Do you see that?
13:38:38	5 Q. No. 6 Item No. 1 -- 7 A. It may be the name of a company. I 8 don't know. 9 Q. The Item No. 1 references, "The OME 10 manufacturing and other products shall continue in 11 Spain." 12 Do you see that? 13 A. Yes.	13:42:14	5 A. (In French) Oui. 6 Q. Do you remember in or around August of 7 2000 there being any discussion within Ethypharm -- 8 MR. MINGOLLA: Can I hear the first part 9 of that question back?
13:38:51	10 manufacturing and other products shall continue in 11 Spain." 12 Do you see that? 13 A. Yes. 14 Q. Do you know what the reference to OME 15 manufacturing is to? 16 A. Maybe that's Omeprazole. 17 Q. And when Item 1 indicates that the 18 fabrication will continue in Spain, do you have an 19 understanding as to where in Spain the Omeprazole 20 will be manufactured? 21 A. Well, I imagine that seeing the fact 22 that it has been manufactured, Omeprazole has been	13:42:42	10 (Whereupon, the court reporter read back 11 the pertinent portion of the record.) 12 BY MR. MINGOLLA: 13 Q. -- about the possibility of closing 14 Ethypharm Spain? 15 A. The answer is yes. 16 Q. And -- 17 A. That was my objective, but Ethypharm 18 Madrid. 19 Q. And did you have that objective 20 immediately upon arriving at Ethypharm earlier in 21 2000? 22 A. Not directly upon arrival --

32 (Pages 122 to 125)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8t

JT-A-582

ESQUIRE DEPOSITION SERVICES

Page 126	Page 128
<p>13:43:25 1 Q. Mm-hmm. 2 A. -- of course. Not the first minute. 3 But after three to four months, I wrote 4 and I tried to deploy a reorganization plan, in 13:43:50 5 which it became abundantly clear that Ethypharm was 6 installed in places which did not necessarily 7 give -- well, make any sense. And it was 8 insufficiently existing in countries which were -- 9 which was strategic in -- strategically important, 13:44:30 10 one of which was the United States. 11 Q. A moment ago you referenced drafting a 12 reorganization plan. Do you remember that? 13 A. Yes. 14 Q. Was that a document that you personally 13:44:51 15 wrote? 16 A. Yes. 17 Q. Were there any other individuals at 18 Ethypharm who were involved in drafting that 19 reorganization plan? 13:45:23 20 A. No, the -- the authoring of the 21 reorganization plan, that was my assignment, and it 22 was my responsibility.</p>	<p>13:47:55 1 A. No. 2 Q. Did you type the reorganization plan 3 into a computer yourself? 4 MR. FINE: Objection. Foundation. 13:48:10 5 THE WITNESS: Well, I can respond to 6 that. I never touched a computer in my life. 7 BY MR. MINGOLLA: 8 Q. Did you ever print -- did you ever see a 9 copy of the reorganization plan as an actual 13:48:22 10 document? 11 A. There were bits of documents here and 12 there, but the whole entire document, no. And this 13 was a confidential thing which went on between 14 Mr. Leduc, Patrice Debrégeas, and I myself. 13:48:59 15 Q. Was -- 16 A. And if you ever find in your lifetime a 17 document of a reorganization plan in a company, you 18 will have to let me know because I would be very 19 interested so I would -- to make some progress. 13:49:27 20 Q. Was the reorganization plan a 21 typewritten document? 22 A. There were documents typed.</p>
Page 127	Page 129
<p>13:45:37 1 On the other hand, there were -- there 2 were other people who were present and who were 3 participating in my decision-taking because there 4 were investments, and it had -- and -- and it had a 13:45:57 5 direct impact on people, and these people were 6 notably Mr. Leduc and Patrice Debrégeas. 7 Q. Do you recall over what period of time 8 you drafted the reorganization plan? 9 A. No. It was a permanent process. 13:46:26 10 Q. Did you work on the reorganization plan 11 during the entire time you were employed at 12 Ethypharm? 13 A. When you arrive at a company with the 14 assignment to make it evolve very fast, it is 13:47:07 15 natural that you spend some of your time on 16 organization projects. 17 Now, luckily, that doesn't take up all 18 your time, because the general director of a large 19 pharmaceutical company has other things to deal 13:47:35 20 with than the organization. 21 Q. Did the reorganization plan that you 22 authored go through a series of drafts?</p>	<p>13:49:41 1 Q. Do you know how -- did you -- you 2 personally did not type a document? 3 A. I think I already answered that 4 question. 13:49:51 5 Q. And I want to -- 6 A. I am physically, mechanically, 7 comfortably not able. 8 Q. Do you know who at Ethypharm typed the 9 reorganization plan? 13:50:11 10 A. My secretary. 11 Q. And who is that? 12 A. I don't remember. 13 Q. Do you know how long the 14 reorganization -- the name, yes. 13:50:24 15 A. I do not recall. 16 Q. Do you recall how long the 17 reorganization plan was? 18 A. No. Well, I do not understand these 19 series of questions because this is not one 13:50:55 20 documents. This is a series of documents. This is 21 an evolution in time. This is not a clear-cut 22 document.</p>

33 (Pages 126 to 129)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b-

JT-A-583

ESQUIRE DEPOSITION SERVICES

Page 130	Page 132
<p>13:51:03 1 Q. Did the issue of closing Ethypharm 2 Spain -- was that discussed -- strike that. 3 Was the issue of closing Ethypharm Spain 4 discussed throughout the period that you were 13:51:18 5 employed at Ethypharm? 6 A. No. 7 Q. And if I asked -- 8 A. There were discussions -- 9 Q. Mm-hmm. 13:51:39 10 A. -- but it wasn't a daily subject. 11 Q. And were you a participant in -- in 12 those discussions? 13 A. Of course, I was the person in charge. 14 Q. And was it your view that Ethypharm 13:52:00 15 Spain ought to be closed? 16 A. Yes. 17 Q. And do you recall why you were of that 18 view? 19 A. Because I didn't understand what the 13:52:33 20 interest would be to have an -- an affiliate in 21 Spain and not to have any in Germany, various -- 22 the figures in Germany were ten times higher than</p>	<p>13:54:19 1 A. After I left. 2 Q. Turning back to Exhibit 9, I have a 3 couple of questions about the section that reads -- 4 the numbered items that follow, par conséquent, 13:54:38 5 the -- as a result. 6 Item No. 1 reads, "Philippe Boudal and 7 Adolfo de Basilio are coming together so that 8 operational follow-up of manufacturing in Zaragoza 9 is done under the direct control of Ethypharm 13:54:57 10 Industries." 11 Do you see that? 12 A. Yes. 13 Q. Do you have an understanding as to what 14 that is a reference to? 13:55:04 15 A. Yes. 16 Q. And what is that understanding? 17 A. In the change of organization, it was 18 decided that the industrial management or director 19 was in charge of the -- the Ethypharm Group of the 13:55:40 20 activities of Ethypharm Group. By that, I mean of 21 France, the three sides in France, China, India, 22 and everything which could be linked to</p>
Page 131	Page 133
<p>13:52:53 1 the figures in Spain. And I didn't -- and I did 2 not understand why there was a affiliate in Spain 3 and in Brazil, for that matter, because the same 4 applies to Brazil. And there was no in the United 13:53:17 5 States which, however, represents more than 6 50 percent of the -- the house market, the world 7 house market. 8 Do you want me to continue? 9 Q. If -- if there are other reasons, please 13:53:31 10 do. 11 A. Well, it's just logical. 12 Q. Do you recall whether Mr. Leduc agreed 13 with your logic? 14 A. Yes. 13:53:48 15 Q. And what about Mr. Debrégeas? 16 A. Yes, with regards to the principal. 17 Q. Do you know whether Ethypharm Spain ever 18 was closed? 19 A. Yes. 13:54:12 20 Q. And was it? 21 A. Yes. 22 Q. And do you know when?</p>	<p>13:55:58 1 manufacturing, made by third parties or not; and, 2 one of them being Spain. 3 And so it was asked that Philippe 4 Boudal, who before was only responsible for the 13:56:20 5 French sides, from the moment onward, where he was 6 in charge of the whole entire group was, and the 7 surveillance of the industrial department and 8 part -- and one of those was Spain. 9 This is my understanding. 13:56:45 10 Q. Okay. Thank you. 11 As to Item No. 3, which reads for the 12 record, "As soon as the management transfer is 13 established, Ethypharm Spain proceeds with the 14 layoff of four persons (advance notice at 13:57:00 15 December 31st, 2000" -- 16 A. (In French) Oui. 17 Q. -- "the only people to remain being 18 Adolfo de Basilio and one assistant; small premises 19 can be found." 13:57:10 20 MR. FINE: Objection. The document's 21 infraction. 22</p>

34 (Pages 130 to 133)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b

JT-A-584

ESQUIRE DEPOSITION SERVICES

Page 134		Page 136	
13:57:13	1 BY MR. MINGOLLA:	14:00:27	1 that if you are physically present in a country it
	2 Q. Do you -- do you see that sentence?		2 is easier for you to deal with the authorities than
	3 A. Yes.		3 if you are not physically present in that country.
	4 Q. Do you have an understanding as to what		4 So I can go on, on all night long.
13:57:18	5 that references to?	14:00:55	5 That it was he, himself, who recruited
	6 A. Yes.		6 the member of his team, and he did not see himself
	7 Q. Do you recall whether the layoff		7 as dismissing them. And so he had plenty of very,
	8 mentioned in Item No. 3 did, in fact, take place?		8 very, very good reasons.
	9 A. Yes, it took place, but I don't know		9 Q. Do you remember whether, during any of
13:57:45	10 whether it took place on the 31st of December.	14:01:14	10 the discussions as to whether to close Ethypharm
	11 Q. Was Mr. de Basilio involved in the		11 Spain, the issue of Laboratorios Belmac arose?
	12 discussions about the possible closing of Ethypharm		12 A. No, I do not see any link.
	13 Spain?		13 Q. Okay.
	14 A. Yes.		14 A. That had absolutely no link. It was
13:58:07	15 Q. Do you recall discussing that subject	14:01:41	15 comfortably independent.
	16 with him?		16 Q. I'd like to show you the next exhibit.
	17 A. Yes.		17 MR. MINGOLLA: It's Exhibit 10?
	18 Q. And do you know what Mr. de Basilio's		18 THE COURT REPORTER: (Nodded
	19 opinion on that subject was?		19 affirmatively.)
13:58:22	20 A. Yes.	14:02:02	20 (Germain Deposition Exhibit No. 10
	21 Q. And what was that?		21 was marked for Identification.)
	22 A. He was not really in agreement. Rarely		22
Page 135		Page 137	
13:58:37	1 have I known chiefs of enterprises who were in	14:02:10	1 BY MR. MINGOLLA:
	2 agreement to close down their installations,		2 Q. Feel free to look at the entire
	3 whether this happens at Ethypharm in the		3 document, although for the first few questions, I'm
	4 pharmaceutical industry, in a law firm, or in		4 only going to ask you about the first two pages,
13:58:55	5 whatever other structure.	14:02:16	5 okay?
	6 Q. Mm-hmm.		6 And while you're looking at it, let me
	7 A. But I don't know if I responded well to		7 identify it for the record.
	8 your question.		8 Exhibit 10 is a multipage document
	9 Q. Let me ask you this.		9 bearing production numbers EP 009103 through 9109
13:59:07	10 Do you remember any specific reason or	14:02:41	10 (Witness reviews document.)
	11 reasons that Mr. de Basilio articulated as to why		11 A. (In English) Okay.
	12 Ethypharm Spain should not be closed?		12 Q. Do you recognize this document?
	13 A. Many, many reasons.		13 A. No.
	14 Q. Well, what --		14 Q. Do you see that your name is listed
13:59:46	15 A. All the reasons which a boss in a	14:03:28	15 among the recipients in "To" line at the top?
	16 company brings up when you want to close down a		16 Do you see that?
	17 facility. For example, that the customer service		17 A. Yes.
	18 is better when it's local than central; that the		18 Q. And the document is from Adolfo
	19 commission department works much better when one is		19 de Basilio; is that correct?
14:00:14	20 present in the country than when it is handled in	14:03:47	20 A. That's correct.
	21 Paris; and, it is way better to do the regulatory		21 Q. And could you read the subject line,
	22 affairs on a local level than on a central level;		22 please?

35 (Pages 134 to 137)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8t

JT-A-585

ESQUIRE DEPOSITION SERVICES

Page 138		Page 140	
14:03:48	1 A. Actions and observations on the "C.R. de 2 la Réunion Éthypharm Espagne du 4-10-00." 3 Q. Would you translate that please? 4 THE INTERPRETER: Where do you see this?	14:06:31	1 It's a document that describes the functions of the 2 people who work in the company, the structure of 3 the company, the organization of the company. 4 Q. Do you recall ever asking Mr. de Basilio 5 to obtain an Organigramme from Belmac? 6 A. No, I don't recall. 7 Q. Do you know whether anyone else at 8 Ethypharm France requested that Mr. de Basilio 9 obtain an Organigramme from Belmac?
14:04:12	5 Yeah. 6 THE WITNESS: The actions and 7 observations on the "C.R. de la Réunion Éthypharm 8 Espagne from April -- no, from the 4th of October 9 2000.	14:06:45	5 6 7 8 9
14:04:23	10 Yes. 11 BY MR. MINGOLLA: 12 Q. That's -- thank you. 13 Do you recall visiting Spain in or 14 around October of 2000 to visit Ethypharm Spain's 15 offices?	14:07:13	10 A. I have no idea. 11 Q. Later on in Item No. 3 Mr. de Basilio 12 writes, "I hope you realize how difficult for me is 13 to maintain confidentiality under these 14 circumstances."
14:04:41	16 A. No, I don't recall but it is not 17 impossible. 18 Q. Do you have an understanding as to what 19 the first two pages of Exhibit 10 are?	14:07:25	15 Do you see that? 16 A. Yes. 17 Q. Do you have an understanding as to what 18 Mr. de Basilio is referring to there? 19 A. No.
14:04:56	20 A. No. 21 Q. In looking at Item No. 1 of Exhibit 10 22 under the heading Document synthétique Belmac, do	14:07:38	20 Q. Let's look at Item No. 4. And the last 21 sentence of that section references a possible sell 22 of products and equipment to Belmac.
Page 139		Page 141	
14:05:13	1 you see that? 2 A. (In French) Oui. 3 Q. Mr. de Basilio writes in the first 4 sentence, "I'm sorry to tell you that I haven't 5 been able to obtain a brochure from Belmac." 6 Do you see that sentence? 7 A. Yes. 8 Q. Do you remember ever asking 9 Mr. de Basilio for a brochure from Belmac?	14:07:52	1 Do you see that? 2 A. Yes. 3 Q. Do you recall -- do you know what that's 4 in reference to?
14:05:19	10 A. No. 11 Q. Do you have any understanding as to what 12 brochure Mr. de Basilio is -- is referencing there? 13 A. (In English) No. 14 Q. Let's turn to Item No. 3, the 15 Organigramme. 16 Do you see that? 17 It's -- I think you're on the wrong 18 page. We're still on the first page. 19 Do you know what an Organigramme is?	14:08:08	5 A. What do you mean? For the -- for the -- 6 Q. Let me -- let me -- 7 THE INTERPRETER: Okay. 8 Q. -- read the sentence into the record. 9 "Hence, my recommendation is to leave 10 this idea unless we either sell products and 11 equipment to Belmac or we take manufacturing to our 12 premises in France or we sell Ethypharm Spain to 13 someone else." 14 Do you see that sentence? 15 The sentence beginning with Hence. 16 Do you see that sentence? 17 A. I see it. 18 Q. And do you see the reference to the 19 possible sale of products and equipment to Belmac? 20 (Whereupon, at 2:09:29 p.m., 21 Mr. Bostwick entered the proceedings.) 22 A. I see it.
14:05:34	10 A. No. 11 Q. Do you have any understanding as to what 12 brochure Mr. de Basilio is -- is referencing there? 13 A. (In English) No. 14 Q. Let's turn to Item No. 3, the 15 Organigramme. 16 Do you see that? 17 It's -- I think you're on the wrong 18 page. We're still on the first page. 19 Do you know what an Organigramme is?	14:08:14	10 this idea unless we either sell products and 11 equipment to Belmac or we take manufacturing to our 12 premises in France or we sell Ethypharm Spain to 13 someone else." 14 Do you see that sentence? 15 The sentence beginning with Hence. 16 Do you see that sentence? 17 A. I see it. 18 Q. And do you see the reference to the 19 possible sale of products and equipment to Belmac? 20 (Whereupon, at 2:09:29 p.m., 21 Mr. Bostwick entered the proceedings.) 22 A. I see it.
14:05:48	15 Organigramme. 16 Do you see that? 17 It's -- I think you're on the wrong 18 page. We're still on the first page. 19 Do you know what an Organigramme is?	14:08:43	15 The sentence beginning with Hence. 16 Do you see that sentence? 17 A. I see it. 18 Q. And do you see the reference to the 19 possible sale of products and equipment to Belmac? 20 (Whereupon, at 2:09:29 p.m., 21 Mr. Bostwick entered the proceedings.) 22 A. I see it.
14:06:07	20 A. (In French) Oui. 21 Q. And what is it? 22 A. An Organigramme is a -- is a document.	14:09:34	20 (Whereupon, at 2:09:29 p.m., 21 Mr. Bostwick entered the proceedings.) 22 A. I see it.

36 (Pages 138 to 141)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b-

JT-A-586

ESQUIRE DEPOSITION SERVICES

Page 142		Page 144	
14:09:42	1 Q. Do you know -- do you know what that is	14:21:02	1 (Germain Deposition Exhibit No. 11
	2 in reference to?		2 was marked for Identification.)
	3 A. No. Because I believe that as far as I		3 THE VIDEOGRAPHER: On the record with
	4 remember the -- the machines belong to Ethypharm;		4 tape number three of the testimony of Pierre
14:10:06	5 the personnel was Belmac; and, the side belonged to	14:30:33	5 Germain in the matter of Ethypharm versus Bentley
	6 Belmac.		6 Pharmaceuticals.
	7 So I do not see what Ethypharm could		7 The date is August 1st, 2066.
	8 sell as far as material goes to Belmac.		8 The time is 14:30:15.
	9 Q. The last clause of that sentence		9 BY MR. MINGOLLA:
14:10:33	10 references a possible sale of Ethypharm Spain to	14:30:44	10 Q. Mr. Germain, I'd like to hand to you
	11 someone else.		11 what's been marked as Exhibit No. 11 and ask you to
	12 Do you see that?		12 take a moment to review it, please.
	13 A. I do not understand that. That must be		13 (Witness reviews document.)
	14 a mistake, a typing mistake.		14 Q. And for the record, Exhibit 11 is a
14:10:59	15 Q. Do you ever recall -- I'm sorry.	14:30:56	15 one-page document bearing production No. EP 005980.
	16 A. Because Ethypharm Spain at my time was		16 A. (In French) Oui.
	17 never for sale. The only structure which -- I		17 Q. Do you recognize this document?
	18 mean, the only project, which we have this, regards		18 A. No.
	19 to Spain was the restructuring in order to close on		19 Q. Do you see yourself listed as a cc?
14:11:25	20 a local level in Spain, but I do not see what there	14:31:20	20 A. That's correct.
	21 was for sale.		21 Q. And the date of this document is
	22 Q. Do you recall any discussions in		22 November 9th, 2000; is that correct?
Page 143		Page 145	
14:11:34	1 Ethypharm in 2000 concerning the possible sell of	14:31:29	1 A. Correct.
	2 the Spanish subsidiary to someone else?		2 Q. The -- the sender of this e-mail is
	3 Yes.		3 someone by the name of Laurence Guggenbuhl,
	4 A. No.		4 G-U-G-G-E-N-B-U-H-L.
14:11:56	5 Q. Item No. 5 says -- says, "Edition of CoA	14:31:41	5 Do you see that?
	6 by Belmac."		6 A. (In French) Oui.
	7 Do you see that?		7 Q. Do you know who that person is?
	8 A. Yes.		8 A. Yes.
	9 Q. Do you know what CoA is a reference to?		9 Q. And who is he?
14:12:06	10 A. No.	14:31:57	10 A. She is responsible for purchasing.
	11 Q. Okay.		11 Q. Oh.
	12 A. Co -- no.		12 Purchasing what?
	13 Q. Okay.		13 A. All.
	14 MR. MINGOLLA: Let's go off the record.		14 Q. Does that include purchasing raw
14:12:17	15 THE WITNESS: (In English.)	14:32:13	15 materials for Omeprazole?
	16 THE VIDEOGRAPHER: This ends tape number		16 A. All, yes.
	17 two of the Germain deposition.		17 Q. And is that purchasing for all of the
	18 The time is 14:12:01.		18 subsidiaries of Ethypharm?
	19 Off the record.		19 A. In principle, yes. But she did not have
14:21:02	20 (Whereupon, at 14:12:01 p.m., a recess	14:32:51	20 to do much with China and India, and the reason for
	21 was taken, and the proceedings resumed at		21 that being the distance.
	22 14:30:15 p.m., this same day.)		22 Q. The -- the -- the recipient of this

37 (Pages 142 to 145)

ESQUIRE DEPOSITION SERVICES

Page 146		Page 148	
14:33:04	1 e-mail there is a -- an e-mail	14:36:27	1 Q. Do you have an understanding as to what
	2 Ethypharm@Ethypharm.es.		2 that is a reference to?
	3 Do you see that?		3 A. The objective officer of the company is
	4 A. Yes, I see that.		4 to do what is mentioned here, meaning to transfer
14:33:17	5 Q. Do you know what Ethypharm.es is a	14:37:04	5 with regards to raw material that told these little
	6 reference to?		6 countries this was objective and objective does not
	7 A. No.		7 necessarily mean that this is going to be
	8 Q. The e-mail, the first two words are,		8 implemented.
	9 "Bonjour Adolfo" or hello Adolfo.		9 Q. The next sentence says, "Via the
14:33:34	10 Do you see that?	14:37:27	10 October 30th, 2000, mail, regulatory affairs
	11 A. Actually, I believe this is a mistake,		11 communicated the documents to be supplied and the
	12 because you see in the past before and after the		12 procedures to be followed with the Spanish
	13 e-mail address, and I have never seen it.		13 government."
	14 Q. Okay. Do you see the first two words of		14 Do you see that sentence?
14:33:58	15 the e-mail, Bonjour Adolfo?	14:37:52	15 A. (In French) Oui.
	16 A. Yes.		16 Q. Do you have an understanding what the
	17 Q. Do you know who Adolfo is?		17 reference to les affaires réglementaires is in
	18 A. I imagine it is Adolfo de Basilio.		18 reference to?
	19 Q. Okay.		19 A. (In French) Ouais.
14:34:12	20 A. That's maybe.	14:38:01	20 Q. What is that?
	21 Q. The first paragraph immediately before		21 A. Regulatory affairs where Mrs. Hélène
	22 the two hyphens says, "I remind you that our		22 Carpentier is the direct -- I mean, the leader, the
Page 147		Page 149	
14:34:21	1 immediate objective is to place all of our exotic	14:38:19	1 manager, at that time. They have as an objective
	2 markets to this new origin."		2 to communicate to the local authorities all the
	3 Do you see that?		3 information once there is transfer of a file.
	4 A. Yes, I see that.		4 Q. And is Madam Carpentier -- was she, as
14:34:37	5 Q. Do you have an understanding as to what	14:38:44	5 of November 2000, an employee in France at
	6 that is in reference to?		6 Ethypharm?
	7 A. Yes, at the time. And I don't know if		7 A. She was, at that moment in time, the
	8 it is still the case now. The purchasing and		8 responsible person for regulatory affairs for the
	9 customer departments defined what exotic markets,		9 group.
14:35:17	10 everything, which was outside of the principal	14:39:03	10 Q. And did she work in France?
	11 markets. That means that the figures, the turnover		11 A. She works out of Saint Cloud.
	12 the business of Ethypharm, was distributed on five		12 Q. The next paragraph reads, "To go faster
	13 or six countries in principle and then 30 percent		13 in this matter, it was agreed with P. Vernade" --
	14 only for a multitude of small countries. And these		14 V-E-R-N-A-D-E -- "that she draw up Part II C of the
14:36:00	15 countries were called exotic countries or exotic	14:39:28	15 pharmaceutical documentation on the basis of
	16 markets: Venezuela, Brazil, east -- eastern		16 elements that you will supply."
	17 countries, Africa.		17 Do you see that sentence?
	18 Q. The second hyphen reads, "The 2001		18 A. Yes.
	19 objective is to past all production to the Spanish		19 Q. Who is P. Vernade?
14:36:24	20 market."	14:39:46	20 A. I don't know but I assume that this is a
	21 Do you see that?		21 woman because it says she.
	22 A. Yes.		22 Q. Mm-hmm.

38 (Pages 146 to 149)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b

JT-A-588

ESQUIRE DEPOSITION SERVICES

Page 150

14:40:00 1 A. And I assume that she is a member of
2 H       Carpentier's team.
3 Q. The sentence continues "To wit" or A
4 savoir."
14:40:11 5 A. (In French) Oui.
6 Q. And the second hyphenated point is "A
7 declaration by the finished product manufacturer
8 certifying that the synthesis process, the
9 specification, and the analysis methods are not
14:40:23 10 changed."
11 Do you see that sentence?
12 A. Yes.
13 Q. Do you have an understanding as to what
14 that is a reference to?
14:40:46 15 A. You'll see the documents, which need to
16 be communicated to the authorities, traditional
17 documents. So this means that the analysis
18 documents, the stability studies that are not
19 mentioned here but which also need to be
14:41:07 20 communicated, the letter for DMF, and then the
21 statements with everything which has to do with --
22 with technic, including -- including the methods

Page 151

14:41:31 1 you analyze -- the analyst data analyzes the
2 quality -- the quality process --
3 THE WITNESS: Process, yeah.
4 THE INTERPRETER: I wanted to say
14:41:42 5 clearly.
6 THE WITNESS: (In English) Do you say
7 traditional?
8 THE INTERPRETER: I mean, the
9 traditional documents.
14:41:51 10 BY MR. MINGOLLA:
11 Q. The reference to the finished product
12 manufacturer, or in French du fabricant du produit
13 fini, do you know who or what that entity is?
14 A. That's complicated. The intellectual,
14:42:21 15 the finished product, it's the one who makes
16 available -- well, there are two things.
17 There is the --
18 Q. Mm-hmm.
19 A. -- the exploitant and you have the
14:42:38 20 manufacturer.
21 The exploitant may be the manufacturer
22 or the two entities are different. In this case I

Page 152

14:42:56 1 don't know who is the exploiting company.
2 On the other hand, the manufacturer from
3 the moment onwards was this -- had to do with the
4 site in Zaragoza, for example. So was, without any
14:43:20 5 doubt, Belmac because this is the law.
6 Q. Earlier this morning you provided me
7 with testimony about the first of two meetings with
8 Mr. Murphy that you recalled in the year 2000.
9 A. Two or three, two or three I said.
14:43:52 10 Q. Okay. Do you remember in the first
11 meeting you testified occurred when you were
12 introduced to Mr. Murphy --
13 A. I believe, yes.
14 Q. -- by Mr. Debréguas or Mr. Leduc?
14:44:24 15 A. That's what I said.
16 Q. I'd like to now ask you some questions
17 about any other meetings you remember having taken
18 place between yourself and Mr. Murphy.
19 And what -- did you recall meeting
14:44:43 20 Mr. Murphy in -- in Saint Cloud later on in -- in
21 the year of 2000?
22 A. We -- we saw each other in Paris one

Page 153

14:44:57 1 time.
2 Q. And do you recall approximately when
3 this meeting took place in Paris?
4 A. No.
14:45:06 5 Q. Do you recall who, in addition to
6 yourself and Mr. Murphy was -- attended that
7 meeting?
8 A. I remember that I saw Mr. Murphy alone.
9 Q. Do you recall how long that meeting
14:45:29 10 lasted?
11 A. No.
12 Q. Do you remember any subjects that were
13 discussed during that meeting?
14 A. Yes.
14:45:46 15 Q. And what was discussed?
16 A. The topics which were of object --
17 subject to discussion is Mr. Murphy weren't very
18 clear. At the time, I was convinced that
19 concerning the strategy of developing Ethypharm in
14:46:27 20 the American markets that some intelligent
21 agreements should be made between or have to be
22 made between Bentley's (sic) and Ethypharm for

-ESQUIRE DEPOSITION SERVICES

Page 154	Page 156
<p>14:46:49 1 reasons and as to complement -- being a 2 complement -- be an addition to the technological 3 assets of one group, because Ethypharm, they had a 4 financial situation and a manufacturing capacity, 14:47:23 5 which was not necessarily the same at Bentleys 6 (sic) at that time. 7 Well, I -- in short, I had the strong 8 conviction -- the strong conviction that things 9 could happen between those two companies. And then 14:48:08 10 there was -- and I'm sure that this was the same 11 for Mr. Murphy towards me, but, for me, towards 12 Mr. Murphy we had this reciprocal confidentiality. 13 We had trust in each other. 14 And so we mentioned in broad outlines 14:48:34 15 the possible deals of agreement, joint venture, 16 et cetera. 17 So -- well, that's what we talked about. 18 The subject was of importance to me, because I had 19 the feeling that Ethypharm was not physically 14:49:12 20 present enough in the United States, that Bentley 21 presented an opportunity. Maybe I was right or 22 maybe I was wrong. And that Ethypharm was also a</p>	<p>14:51:47 1 A. Yes. 2 Q. And what was that reason or what were 3 those reasons? 4 A. Because of a conflictual (sic) situation 14:52:07 5 with Belmac, which dates back to a time period 6 where I had nothing to do with Belmac, and I never 7 tried to enter deeper into this matter because I 8 had other things to do. 9 My assignment, my mission was to develop 14:52:35 10 Ethypharm and not to -- to be one other participant 11 or one more participant in this historical 12 background, which dates back and so many years, and 13 where I had no knowledge about. 14 Q. Do you recall whether Mr. Murphy 14:52:59 15 requested this meeting with you or whether you 16 requested this meeting with Mr. Murphy? 17 A. It seems to me that we both like to have 18 the meeting. 19 Q. Do you recall how far in advance you 14:53:20 20 learned that Mr. Murphy would be in Paris? 21 A. No. 22 Q. You mentioned a number of -- you</p>
Page 155	Page 157
<p>14:49:34 1 means to accelerate the development of Bentley's. 2 Our discussions never saw the 3 implementation, because I was always clearly 4 stopped in my discussions about possibilities with 14:50:07 5 Mr. Murphy, and by Mr. Leduc, and 6 Patrice Debrégeas. 7 We did not trust Mr. Murphy because of 8 the Belmac past history. There is Belmac that was 9 not my problem because I never was part of that. 14:50:47 10 Q. Do you recall either Mr. Leduc or 11 Mr. Debrégeas specifically saying that they did not 12 trust Mr. Murphy? 13 A. (In English) Yes. 14 Q. What -- to the best of your recollection 14:50:59 15 can you tell me exactly what either or both of them 16 said to you in that regard? 17 A. No. 18 Q. Aside from a general statement to the 19 effect that either or both that Mr. Debrégeas and 14:51:21 20 Mr. Leduc did not trust Mr. Murphy, do you remember 21 any statement of reasons as to why they did not 22 trust Mr. Murphy?</p>	<p>14:53:47 1 mentioned broad outlines of possible deals. You 2 meant -- do you remember the specifics of any 3 possible deal with Bentley? 4 A. Yes, we developed ideas about 14:54:23 5 co-development, possibilities of joint venture, and 6 then on a more humorous note, like you do from time 7 to time, you were imagining a capitalistic 8 partnership. And, of course, I told him at the 9 time that everything which had to do with a 10 capitalistic partnership had nothing to do with 11 me -- 12 Q. Could -- 13 A. -- unfortunately for me. 14 Q. Could you tell me what you mean by a 14:55:18 15 "capitalistic partnership"? 16 A. It was more humor than serious. It 17 would go into the direction of merging possibility. 18 But it was more a joke because Mr. Murphy is an 19 intelligent man, and he knew very well that this 14:55:59 20 type of discussion that I was not the right person 21 to talk to. 22 Q. So this was a joke that Mr. Murphy</p>

40 (Pages 154 to 157)

ESQUIRE DEPOSITION SERVICES

Page 158	Page 160
<p>14:56:08 1 raised himself as opposed to you raising the 2 possibility of a capitalistic partnership? 3 A. No. But that was not a joke where the 4 discussions we had on co-development, development, 14:56:44 5 technology, and the commercial nature. 6 Q. Do you recall any specific product or 7 products that were the subject of a possible 8 co-development deal between Ethypharm and Bentley? 9 A. There were no products. It had more to 14:57:17 10 do with technologies either because Ethypharm 11 worked on a number of technologies and where 12 Bentley was a complimentary asset or technology in 13 projects on which Bentley was working at the time 14 and for which Ethypharm could have been an 14:57:56 15 accelerator. 16 Q. You also mentioned a possibility of a 17 joint venture or joint ventures. 18 Do you remember that? 19 A. Yes, these -- yes, I -- I mentioned that 14:58:17 20 these ideas of marketing, which go together with 21 development. 22 Q. Did you ever see any draft agreements</p>	<p>15:01:25 1 MR. MINGOLLA: Will you mark this as the 2 next exhibit. 3 (Germain Deposition Exhibit No. 12 4 was marked for Identification.) 15:01:31 5 BY MR. MINGOLLA: 6 Q. You've been handed what's been marked as 7 Exhibit 12, and if you could just review those 8 first two pages, and while I identify them for the 9 record, please. 15:01:41 10 A. (In French) Oui. 11 Q. Exhibit 12 is a two-page document 12 bearing production Nos. EP 003283 and 003284. 13 (Witness reviews document.) 14 A. (In French) Oui. 15:02:32 15 Q. Do you recognize -- have you looked at 16 both pages, the first two pages of Exhibit 12? 17 A. (In English) Mm-hmm. 18 (Through the Interpreter) The first one. 19 Q. Okay. And why don't you take a moment 15:02:43 20 and review the second page as well. 21 (Witness reviews document.) 22 A. (In English) Okay.</p>
Page 159	Page 161
<p>14:58:29 1 with respect to any of the possible deals you've 2 just described in the past few minutes? 3 A. No; for one reason. 4 Q. And what is that reason? 14:58:57 5 A. Every time where I tried, I -- I got the 6 name -- no -- I received a definite -- no, a 7 definite -- sorry. 8 I received a definite -- a definite now 9 from Gérard Leduc and from Patrice Debrégeas. 14:59:26 10 Q. And when you say "no," you mean N-O? 11 A. (In English.) N-O. 12 Q. Do you recall any other meetings with 13 Mr. Murphy later on in the year 2000? 14 A. No. Maybe once but I'm not sure. On 14:59:57 15 the other hand, we were in contact. And I 16 reorganized having been able to undertake 17 successfully these with Bentley's (sic) and the 18 condition was that I got Mr. Leduc and Mr. Murphy 19 at the same table to talk about their problem 15:00:44 20 Belmac, where I had no insight, and where Mr. Leduc 21 and Mr. Debrégeas would have told me, Well, now we 22 can go ahead because we build up trust towards him.</p>	<p>15:03:00 1 Q. Do you recognize what's been marked as 2 Exhibit 12? 3 A. Yes, I see it. 4 Q. And what is it? 15:03:13 5 A. It is internal notes; everything by Yves 6 Liorzou. 7 Q. And the date of this document is 8 November 22nd, 2000; is that correct? 9 A. Yes. 15:03:34 10 Q. And the subject line under Note Interne 11 is Belmac meeting, the November 22nd, 2000. 12 Do you see that? 13 A. Yes. 14 Q. Do you recall the meeting described on 15:03:45 15 the first page of Exhibit 12? 16 A. No, I do not recall this meeting. 17 Q. Okay. And turning to the second page of 18 Exhibit 12, do you see that the -- under Note 19 Interne it, again, says Belmac meeting of 15:04:17 20 November 22nd 2,000. 21 Do you see that? 22 A. Yes.</p>

41 (Pages 158 to 161)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b-

JT-A-591

ESQUIRE DEPOSITION SERVICES

Page 162	Page 164
<p>15:04:21 1 Q. And the participants listed at that 2 meeting are a Mr. Liorzou, Mr. de Basilio, and 3 Mr. Herrera. 4 Do you see that? 15:04:30 5 A. Yes. 6 Q. Do you recall those three gentlemen 7 meeting concerning Belmac in or around November of 8 2000? 9 A. No. 15:04:49 10 Q. Do you recall any meeting which you and 11 Mr. Leduc and Mr. Murphy were -- were discussing 12 issues pertaining to Belmac while you were employed 13 at Ethypharm -- 14 THE INTERPRETER: Who did you mention? 15:05:09 15 Oh. 16 BY MR. MINGOLLA: 17 Q. Belmac, discussed Belmac while you were 18 employed at Ethypharm. 19 A. Yes, I do recall. 15:05:24 20 Q. And -- and what do you recall about that 21 meeting? 22 A. I don't have any memory.</p>	<p>15:07:29 1 topics I brought up just before. By that, I mean 2 global agreements with Bentley's (sic) between 3 Bentley's (sic) and Ethypharm, but I never -- I 4 never was able to convince General Leduc to go any 15:08:02 5 further with that thought because of an ambiguous 6 situation of which I know nothing with Belmac, and 7 so a lack of trust of General Leduc towards 8 Mr. Murphy. 9 I also recall having said that the 15:08:48 10 global contractual aspect between Belmac and 11 Ethypharm was not clear enough that there was 12 several -- that there was several agreements which 13 were -- which was signed in the course of time, but 14 there was no general contract, which is maybe, and 15:09:27 15 this is how I explain it to myself, the lack of 16 trust of Gerard Leduc towards Jim Murphy. 17 And I'll very clearly, and with detail 18 of the meeting, I don't recall any -- any specific 19 moment because it was clear that I was not 15:10:01 20 participating or involved, and I did not want to be 21 involved in the Belmac historical past problems, 22 because about ten years prior to my arrival, there</p>
Page 163	Page 165
<p>15:05:33 1 Q. But to be clear, the first page of 2 Exhibit 12 is not the -- is not the meeting that 3 you remember? 4 A. Which page? I don't -- 15:05:51 5 Q. The first page of Exhibit 12. 6 A. (In French) Oui. 7 (In English) Mm-hmm. 8 Q. My question is, is this summary the 9 meeting that you remember taking place between 15:06:04 10 yourself, Mr. Leduc, and Mr. Murphy? 11 A. (In French) Oui. 12 Q. It is? 13 A. I do not have any precise recollection 14 if the meeting took place on the 22nd of 15:06:34 15 November 2000, no, I don't. 16 Q. The meeting that you do remember with 17 yourself, Mr. Murphy, and Mr. Leduc, do you 18 remember whether the subject of the possibility of 19 closing Ethypharm Spain arose? 15:07:07 20 A. No, I do not remember that. The memory 21 I have of that is that I encountered Mr. Murphy 22 several times in order to talk with him about</p>	<p>15:10:27 1 were sufficiently -- there was a sufficient number 2 of people who entered these discussions, and I did 3 not see the interest to be one more inter-global. 4 Q. The global agreements that you 15:10:44 5 referenced a few moments ago -- 6 A. (In French) Oui. 7 Q. -- concerning the possible code of 8 element of technology -- 9 A. (In French) Oui. 15:11:04 10 Q. -- or the possible joint ventures, were 11 those agreements that you envisioned being between 12 Bentley and the Ethypharm group? 13 A. Where? I don't know what you mean. 14 Q. A few moments ago you testified about 15:11:36 15 possible global agreements? 16 A. Between Bentley and Ethypharm. 17 Q. And when you say Ethypharm, do you mean 18 the Ethypharm group or a particular subsidiary of 19 Ethypharm's? 15:12:03 20 THE INTERPRETER: What was the question? 21 BY MR. MINGOLLA: 22 Q. Or any subsidiary of Ethypharm.</p>

42 (Pages 162 to 165)

ESQUIRE DEPOSITION SERVICES

Page 166	Page 168
<p>15:12:10 1 A. No, global. We never came that far in 2 our discussions to be able to talk about the 3 projects which could be put into reality much later 4 on.</p> <p>15:12:45 5 So we were now -- we are at the level 6 where any discussions are brought if this 7 development would take place with America, Japan, 8 any other country. He never came that far.</p> <p>9 Q. Do you recall whether you specifically 15:13:01 10 ever discussed Belmac with Mr. Murphy? 11 A. Yes, I spoke about Belmac with 12 Mr. Murphy.</p> <p>13 Q. Do you recall how frequently you spoke 14 about Belmac with Mr. Murphy?</p> <p>15:13:28 15 A. We brought up the Belmac subject every 16 time we saw each other or we had each other on the 17 phone for one simple reason. And for one reason, 18 that one reason being that this Belmac problem was 19 that the problem that hindered us to be able to 15:14:03 20 dive into subjects which are of interest to both of 21 us and which came from me.</p> <p>22 Q. Do you recall ever telling Mr. Murphy</p>	<p>15:16:23 1 of the Belmac situation.</p> <p>2 Q. Can you tell me -- you said at each 3 meeting or phone call that you had with Mr. Murphy 4 you discussed the Belmac issue; is that correct?</p> <p>15:16:46 5 A. I did not say that the subject of Belmac 6 came up in that conversation. I said that the 7 Belmac subject came up at one moment or another and 8 it just was brought up to the table, because it 9 prevented us from -- further our ideas on 15:17:23 10 development.</p> <p>11 Q. Do you recall whether you brought up the 12 Belmac subject or whether that was a subject that 13 Mr. Murphy brought up?</p> <p>14 A. The two, both. He -- when he gives me 15:17:56 15 information and tried to justify his position, and 16 I know that to be able to find solutions, meaning 17 solutions which I could not -- he could not put 18 together myself because I had -- I needed 19 Mr. Murphy for that.</p> <p>15:18:27 20 Q. Did -- 21 A. I needed Mr. Leduc for that.</p> <p>22 THE INTERPRETER: Sorry.</p>
Page 167	Page 169
<p>15:14:11 1 that Mr. Leduc did not trust Mr. Murphy? 2 THE INTERPRETER: Did he ever tell who? 3 MR. MINGOLLA: Mr. Murphy.</p> <p>4 THE WITNESS: I -- I try to be 15:14:37 5 well-mannered. But yes, I brought the subject up 6 and he was completely aware of it that the level of 7 trust between him and Gérard Leduc was an essential 8 element to undertake discussions between Ethypharm 9 and Bentley.</p> <p>15:15:09 10 BY MR. MINGOLLA: 11 Q. Do you recall what Mr. Murphy's 12 reaction, if any, was to that statement? 13 A. No. Mr. Murphy is somebody who is very 14 well-mannered.</p> <p>15:15:31 15 Q. Did Mr. Murphy appear troubled by that 16 statement? 17 A. No.</p> <p>18 Q. Did Mr. -- 19 A. No. But I, like many others, I have the 15:16:03 20 feeling that he was concerned about the situation 21 between Belmac and Ethypharm. But neither he nor I 22 ever brought up the contents of that situation --</p>	<p>15:18:31 1 BY MR. MINGOLLA: 2 Q. Did Mr. Murphy ever tell you what, if 3 anything, he would do to try to improve the Belmac 4 situation?</p> <p>15:18:55 5 A. You mean if he ever talked to me about 6 something like that or if he had ideas.</p> <p>7 Q. Let's start with the first. 8 Did Mr. Murphy ever tell you that he 9 would do something to try to improve the Belmac 15:19:08 10 situation? 11 A. No.</p> <p>12 Q. Did Mr. Murphy ever tell you that he had 13 ideas as to something that could be done to try to 14 improve the Belmac situation?</p> <p>15:19:25 15 A. No.</p> <p>16 Q. Did you ever offer any suggestions to 17 Mr. Murphy as to how to improve the Belmac 18 situation? 19 A. No, because this was a very complex 15:19:50 20 historical topic, and I did not have solutions 21 myself, no.</p> <p>22 Q. Did you ever ask either Mr. Leduc or</p>

43 (Pages 166 to 169)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b

JT-A-593

ESQUIRE DEPOSITION SERVICES

Page 170		Page 172	
15:20:02	1 Mr. Debrégeas for a detailed background about the Belmac situation?	15:23:59	1 identify it for the record.
	2	2	Exhibit 13 is a multipage document
	3 A. Yes, I -- I asked because I wanted to	3	bearing production Nos. EP 002009 through 2041
	4 understand.	4	A. No.
15:20:25	5 Q. And do you recall when you asked for the	15:24:13	5 Q. You have not seen that document before?
	6 background about the Belmac situation?	6	A. No. The date on it is -- no, I think I
	7 A. No -- many times.	7	left in May, beginning of May.
	8 Q. And do you recall either or both of	8	Q. Of 2001?
	9 Mr. Leduc or Mr. Debrégeas providing you with a	9	A. Yes, I believe, from memory.
15:20:47	10 background?	15:24:48	10 Q. What -- what --
	11 A. No.	11	A. I do not know this document.
	12 Q. At any point --	12	Q. Okay. Why -- why did you cease working
	13 A. Never clear. There was never a clearer	13	at Ethypharm?
	14 response.	14	A. I -- I left.
15:21:02	15 Q. Did you ever tell either Mr. Leduc or	15:25:07	15 Q. Did you leave voluntarily or were you
	16 Mr. Debrégeas that, as the general director of the	16	fired?
	17 Ethypharm Group, you needed to have a complete	17	A. Yes, voluntary.
	18 understanding of the Belmac situation?	18	Q. And why did you leave Ethypharm after
	19 A. No. Why?	19	just 18 months?
15:21:35	20 Q. Okay. Why not?	15:25:29	20 A. I was in disagreement with a certain
	21 A. Because I knew that this was a	21	number of decisions taken with regards to strategy
	22 historical event and that there was several people	22	and the relation between the shareholders and the
Page 171		Page 173	
15:21:54	1 who were affected by the same situation, that	15:25:58	1 management, the -- the mode of function.
	2 General Leduc was personally involved in this	2	Q. Do you recall specifically any decisions
	3 story, and that I had 100,000 other subjects to	3	with which you disagreed?
	4 deal which -- with which were under my	4	A. Yes.
15:22:29	5 responsibility.	15:26:18	5 Q. And what were they?
	6 Q. Do you remember when you ceased working	6	A. That's personal however.
	7 at Ethypharm?	7	Q. I must nevertheless ask you to tell me
	8 A. I stayed with Ethypharm for one and a	8	what those decisions were.
	9 half years.	9	MR. FINE: If you'd like to go off the
15:22:59	10 Q. So at some point in 2001 you left	15:26:33	10 record, you know, I can see if there's a problem
	11 Ethypharm's employment?	11	with this.
	12 A. It was in the middle of 2001.	12	MR. MINGOLLA: Okay.
	13 MR. MINGOLLA: Let's have this marked as	13	Let's go off the record for one moment,
	14 Exhibit 13, please.	14	please.
15:23:34	15 (Germain Deposition Exhibit No. 13	15:26:40	15 THE VIDEOGRAPHER: The time is 15:26:14
	16 was marked for Identification.)	16	Off the record.
	17 BY MR. MINGOLLA:	17	(Discussion held off the record.)
	18 Q. My question for you simply is going to	18	THE VIDEOGRAPHER: On the record.
	19 be whether you recognize this document.	19	The time is 15:29:21.
15:23:40	20 If you want to read the whole thing,	15:29:50	20 BY MR. MINGOLLA:
	21 you're welcome to do so.	21	Q. Mr. -- Mr. Germain, do you know what --
	22 And while you're reviewing it, let me	22	can you identify any decisions with which you

44 (Pages 170 to 173)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8I

JT-A-594

ESQUIRE DEPOSITION SERVICES

Page 174	Page 176
<p>15:29:57 1 disagreed which prompted your decision to leave 2 Ethypharm? 3 A. I left Ethypharm because of two major 4 reasons. The first one is from the position of a 15:30:33 5 director general working at the -- working at the 6 side of two shareholders present in the company and 7 being not always in -- in agreement among each 8 other for the global or daily choices of the level 9 of company. It is a position which is very 15:31:19 10 difficult, very sporty. 11 The second reason for which I left I was 12 in total disagreement with regards to the decision 13 of the shareholders to -- to defer the -- 14 Q. Can I move up? 15:32:08 15 MR. FINE: Yeah, move up would be -- 16 would be like accelerate or move up. 17 THE WITNESS: Accelerate -- accelerate 18 the decision of the shareholders to introduce the 19 share on the -- on the study exchange. 15:32:24 20 I thought that this was a real mistake 21 and that it could never work. And out of respect, 22 I do not remain in a company where I cannot respect</p>	<p>15:34:11 1 were not always in agreement on the global or daily 2 choices. 3 A. (In English) All together, between 4 him -- between all three of them. 15:34:19 5 (Through the Interpreter) All three of 6 them, yeah. So among them. 7 Q. Mm-hmm. Do you recall specifically any 8 global choice or decision that they were not in 9 agreement on? 15:34:40 10 A. No, it was quasi systematic and 11 cultural. 12 Q. Did Mr. Leduc attempt to persuade you 13 not to -- to resign from Ethypharm? 14 A. Yes. 15:34:58 15 Q. And he was unsuccessful, I take it? 16 A. That's correct. 17 Q. What did Mr. Leduc say, if anything, in 18 an effort to convince you to stay on at Ethypharm? 19 A. He used every argument you can possibly 15:35:32 20 use in this type of proceeding. It was more 21 psychological in nature because I did not ask 22 anything of the financial side.</p>
Page 175	Page 177
<p>15:32:45 1 the strategical decisions anymore. 2 And the last point. So I had the two 3 shareholders as my superiors, and I was without any 4 doubt a little bit closer to one of them, which is 15:33:11 5 very, very difficult to live this on a daily basis. 6 That's it. 7 BY MR. MINGOLLA: 8 Q. Was the shareholder with whom you were 9 closer Mr. Debrégeas? 15:33:25 10 A. No. 11 Q. Mr. Leduc? 12 A. Yes. 13 Q. Okay. Earlier in your answer you -- you 14 discussed that you were not always in agreement 15:33:36 15 with global choices of the two shareholders. 16 A. Again? 17 Q. Let me ask it this way. 18 I believe you testified that you were 19 not always in agreement -- strike that, strike 15:34:03 20 that. 21 You testified, I believe, that the two 22 shareholders, that is Mr. Leduc and Mr. Debrégeas,</p>	<p>15:35:50 1 Q. Why did you think it was a -- a mistake 2 on the part of Mr. Leduc and Mr. Debrégeas to 3 accelerate the listing of the shares on the stock 4 exchange? 15:36:23 5 A. I think that, since the catastrophe of 6 the Internet bubble, the companies involved in 7 biotechnology, such as Ethypharm, if they want to 8 know any type of success in this way of doing 9 things, then you have to be ready with regards to 15:36:58 10 organization, concerning a process in place, on 11 concerning the figures and results and so on. 12 And a company that's -- that -- 13 that's -- that has its shares sold on the stock 14 exchange is a company which is managed in a 15:37:36 15 different way than a company that has its shares in 16 an autonomous way. It just needs preparation. And 17 this doesn't happen from today to tomorrow. You 18 need time. 19 Q. Did -- at any point during the period 15:37:56 20 you were employed at Ethypharm, did Mr. Murphy ever 21 tell you that Mr. Herrera had the authority to act 22 on behalf of Bentley Pharmaceuticals?</p>

45 (Pages 174 to 177)

ESQUIRE DEPOSITION SERVICES

Page 178	Page 180
<p>15:38:21 1 A. No, never. 2 MR. MINGOLLA: I have no further 3 questions at this time, subject to the possibility 4 of asking you some more questions after Mr. Fine 15:38:31 5 poses some questions to you. 6 But at this point, thank you very much. 7 Let's go off the record. 8 THE VIDEOGRAPHER: The time is 15:38:23. 9 Off the record. 15:38:54 10 (Whereupon, at 15:38:23 p.m., a recess 11 was taken, and the proceedings resumed at 12 15:51:27 p.m., this same day.) 13 THE VIDEOGRAPHER: On the record. 14 The time is 15:51:27. 15:51:54 15 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS 16 BY MR. FINE: 17 Q. Good afternoon, Mr. Germain. 18 Thank you for coming back. 19 Um, as you recall from this morning, my 15:52:15 20 name is Jonathan Fine, and I represent Ethypharm 21 here. 22 And -- and I would like to ask you a few</p>	<p>15:54:16 1 Q. Okay. And at the top of the document 2 the fax appears to be or the document appears to be 3 from Bentley Pharmaceuticals; is that correct? 4 A. Yeah, that's correct. 15:54:34 5 Q. And it is dated October 6th, 2000; is 6 that correct? 7 A. Correct. 8 Q. And it is addressed to Pierre Germain. 9 That's you; is that correct? 15:54:50 10 A. Correct. 11 Q. And it's from Mr. James R. Murphy; is 12 that correct? 13 MR. MINGOLLA: Objection. Foundation. 14 BY MR. FINE: 15:55:00 15 Q. The document appears to be from 16 Mr. James R. Murphy; is that correct? 17 A. Correct. 18 Q. Do you have any reason to believe that 19 this document is not from Mr. James R. Murphy? 15:55:19 20 A. No, I don't have any reason. 21 Q. Okay. And underneath Mr. Murphy's name 22 appears the title Chairman and CEO; is that</p>
Page 179	Page 181
<p>15:52:29 1 questions in response to some of the subjects that 2 Mr. Mingolla raised earlier today. 3 And -- 4 A. Very well. 15:52:43 5 Q. -- I'd like to show you a document and 6 have it marked as an exhibit. 7 (Germain Deposition Exhibit No. 14 8 was marked for Identification.) 9 THE WITNESS: (In French) Merci. 15:53:02 10 BY MR. MINGOLLA: 11 Q. And please take a few moments to review 12 it. 13 And for the record, I will identify the 14 document as a document bearing production 15:53:24 15 No. BEL001071. 16 (Witness reviews document.) 17 A. (In English) Okay. 18 Q. And is this document a facsimile? 19 A. You asked me that question. I don't 15:54:05 20 know. 21 Q. Does it appear to be a fax or a letter? 22 A. A fax, no; a fax, maybe.</p>	<p>15:55:27 1 correct? 2 A. That's what's written here. 3 Q. And that is Chairman and CEO of Bentley 4 Pharmaceuticals; is that correct? 15:55:43 5 MR. MINGOLLA: Objection. Foundation 6 BY MR. FINE: 7 Q. You can answer the question. 8 A. That's what is written here. 9 Q. Okay. And if you look down a little 15:55:54 10 bit, the letter begins, Dear Pierre. 11 A. (In French) Oui. 12 Q. Okay. And did you receive this fax? 13 A. Seemingly, yes. 14 Q. Do you have any reason to believe that 15:56:17 15 you did not receive this fax? 16 A. No. 17 Q. Okay. And if you look at the top of the 18 document you'll see the date October 25th, 2004. 19 A. (In French) Oui. 15:56:33 20 Q. Okay. Do you know what that refers to? 21 A. No. 22 Q. Were you at Ethypharm in 2004?</p>

46 (Pages 178 to 181)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b

JT-A-596

ESQUIRE DEPOSITION SERVICES

Page 182	Page 184
<p>15:56:43 1 A. No. 2 Q. Thank you. 3 If you look down to where it says, Dear 4 Pierre, the first paragraph says, "Thank you for 15:56:54 5 spending time with me during my visit to Paris." 6 Is that correct? 7 And -- 8 A. Yes. 9 Q. -- "I apologize for being tired, but 15:57:02 10 with only three hours of sleep, I was not as 11 enthusiastic as usual." 12 Is that correct? 13 A. Yes. 14 Q. Um, and below that are three points; is 15:57:20 15 that correct? 16 A. (In French) Oui. 17 Q. Okay. And the first point appears to, 18 Bentley will assume the oversight of the operation. 19 MR. MINGOLLA: Objection. 15:57:35 20 It misreads the document. 21 BY MR. FINE: 22 Q. Bentley will assume the administrative</p>	<p>15:59:26 1 as I did. But since, anyway, this did not come 2 from me from my side that it was Mr. Gérard Leduc 3 who was the responsible person for that. I could 4 not do anything -- 15:59:48 5 MR. FINE: Okay. 6 THE WITNESS: -- anything precise. *7 BY MR. FINE: 8 Q. Um, I'm not sure I understand. So if I 9 could ask perhaps in a different way. 15:59:58 10 Did Mr. Murphy discuss the subjects of 11 points one, two, and three with you in his meeting 12 with Paris? 13 MR. MINGOLLA: Objection. Asked and 14 answered. 16:00:29 15 BY MR. FINE: 16 Q. You may answer. 17 A. The way it is written here, yes. 18 Q. And -- 19 MR. FINE: I have no further questions. 16:00:42 20 EXAMINATION BY COUNSEL FOR THE DEFENDANT 21 (Continued) 22 BY MR. MINGOLLA:</p>
Page 183	Page 185
<p>15:57:40 1 oversight of the operation and guarantee Ethypharm 2 income -- 3 A. (In French) Oui. 4 Q. -- through royalties equal in value 15:58:04 5 to -- and it goes on. 6 My question to you is: Did you discuss 7 these three points with Mr. Murphy? 8 MR. MINGOLLA: Objection. Vague. 9 BY MR. FINE: 15:58:23 10 Q. And let me rephrase that. 11 When -- did Mr. Murphy discuss these 12 three points with you during his visit to Paris? 13 MR. MINGOLLA: I still object as vague. 14 BY MR. FINE: 15:58:44 15 Q. You can answer. 16 MR. MINGOLLA: And as to foundation. 17 THE WITNESS: I don't have -- I don't 18 have a very precise memory of the contents of our 19 discussions. 15:59:07 20 On the other hand, as I specified 21 before, Mr. Murphy tried to clarify the 22 situation -- shed light on the situation, the same</p>	<p>16:00:43 1 Q. I have a couple of questions for you, 2 Mr. Germain. 3 Do you recall receiving this document in 4 or around October of 2000? 16:00:59 5 A. No. 6 MR. MINGOLLA: No further questions. 7 Thank you very much. 8 THE VIDEOGRAPHER: This ends tape number 9 three and concludes the testimony of Pierre Germain 16:01:10 10 in the matter of Ethypharm versus Bentley 11 Pharmaceutical (sic). 12 The date is August 1st, 2006. 13 The time is 1600 hours, 52 seconds. 14 Off the record. 16:01:21 15 (Whereupon, at 16:00:52, the videotaped 16 deposition was concluded.) 17 (Signature not waived.) 18 19 20 21 22</p>

47 (Pages 182 to 185)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8b-

JT-A-597

ESQUIRE DEPOSITION SERVICES

Page 186		Page 188	
16:01:21 1	ACKNOWLEDGMENT OF DEPONENT	16:01:21 1	ERRATA SHEET
2	I, PIERRE GERMAIN, do hereby acknowledge that I	2	IN RE: ETHYPHARM S.A. FRANCE, and ETHYPHARM
3	have read and examined the foregoing testimony, and	3	S.A. SPAIN Vs. BENTLEY PHARMACEUTICALS, INC.
4	the same is a true, correct and complete	4	RETURN BY:
16:01:21 5	transcription of the testimony given by me and any	16:01:21 5	PAGE LINE CORRECTION AND REASON
6	corrections appear on the attached Errata sheet	6	_____
7	signed by me.	7	_____
8		8	_____
9		9	_____
16:01:21 10		16:01:21 10	_____
11	(DATE) (SIGNATURE)	11	_____
12		12	_____
13		13	_____
14		14	_____
15		16:01:21 15	_____
16		16	_____
17		17	_____
18		18	_____
19		19	_____
20		16:01:21 20	_____
21		21	_____
22		22	_____
		22	(DATE) (SIGNATURE)

Page 187		Page 189	
16:01:21 1	CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC	16:01:21 1	ERRATA SHEET CONTINUED
2	I, Tristan-Joseph, Registered Professional	2	IN RE: ETHYPHARM S.A. FRANCE, and ETHYPHARM
3	Reporter, the officer before whom the foregoing	3	S.A. SPAIN Vs. BENTLEY PHARMACEUTICALS, INC.,
4	proceedings were taken, do hereby certify that the	4	RETURN BY:
16:01:21 5	foregoing transcript is a true and correct record of	16:01:21 5	PAGE LINE CORRECTION AND REASON
6	the proceedings; that said proceedings were taken by	6	_____
7	me stenographically and thereafter reduced to	7	_____
8	typewriting under my supervision; and that I am	8	_____
9	neither counsel for, related to, nor employed by any	9	_____
16:01:21 10	of the parties to this case and have no interest,	16:01:21 10	_____
11	financial or otherwise, in its outcome.	11	_____
12	IN WITNESS WHEREOF, I have hereunto set my hand	12	_____
13	and affixed my notarial seal this day of	13	_____
14	2006.	14	_____
16:01:21 15	My commission expires:	16:01:21 15	_____
16	December 30, 2008.	16	_____
17		17	_____
18		18	_____
19		19	_____
16:01:21 20	NOTARY PUBLIC IN AND FOR THE	16:01:21 20	_____
21	DISTRICT OF COLUMBIA	21	_____
22		22	_____
		22	(DATE) (SIGNATURE)

48 (Pages 186 to 189)

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

84674ccb-ca8l

JT-A-598

ESQUIRE DEPOSITION SERVICES

Page 190

A				
abbreviation 62:3	administrators 29:13 32:7	77:5,7 101:15	analysis 150:9,17	arrangement 77:15
able 90:8 104:4	admit 91:19	Agnés 5:22 99:9,12	analyst 151:1	arrival 72:9 125:22
113:20 129:7	admitted 100:5	99:22	analyze 151:1	164:22
139:5 159:16	Adolf 5:21	ago 14:8,9,15,16	analyzes 151:1	arrive 57:7 127:13
164:4 166:2,19	Adolfo 5:7,13,14	16:1 25:11 42:20	Angell 3:14	arrived 27:19
168:16	6:5,10 36:8 44:8	82:11 97:12	answer 12:11 17:4	32:21 33:20 35:17
absent 64:14	76:11 85:11,20	101:18 105:11,15	20:13 31:9 41:2	57:2 71:22 121:5
absolutely 26:11	86:5 99:7 104:13	126:11 165:5,14	42:16 47:6 63:9	arriving 125:20
36:6 92:20 136:14	106:1 111:4	agree 116:16	70:21 72:4 87:15	articulated 135:11
abundantly 126:5	117:18 118:14	agreed 12:18	87:18 95:22 96:2	aside 17:19 22:22
accelerate 155:1	132:7 133:18	115:21 116:12	112:18 113:21	48:10 82:21 88:14
174:16,17,17	137:18 146:9,9,15	131:12 149:13	122:18 125:15	101:15 155:18
177:3	146:17,18	agreement 2:12	175:13 181:7	asked 17:12,13
accelerator 158:15	adorable 89:8	4:15 7:21 22:11	183:15 184:16	28:21 63:14 97:3
accepted 20:22	advance 133:14	50:17 71:4 78:11	answered 69:6	102:19 105:18
accepting 23:1	156:19	80:7 81:19 83:12	72:10 114:18	114:17 130:7
accidentally 89:14	Advantis 32:11,13	83:13 103:2 112:1	129:3 184:14	133:3 170:3,5
accommodate	Adventis 32:16	116:22 117:2,4,11	answers 11:21	179:19 184:13
12:16	adéquation 69:17	117:20 118:1	anybody 28:11	asking 11:17
accompanying	affaires 148:17	134:22 135:2	anymore 21:21	109:10 139:8
121:12	affaires 83:9,14	154:15 174:7	121:13 175:1	140:4 178:4
account 100:4	102:11,17 103:3	175:14,19 176:1,9	anyway 83:10	asks 21:13
accurately 77:15	135:22 148:10,21	agreements 52:13	184:1	aspect 24:15 66:3
acknowledge 186:2	149:8	153:21 158:22	apologize 182:9	118:3,15 120:13
ACKNOWLED...	affiliate 37:15,16	164:2,12 165:4,11	apparently 59:3	164:10
186:1	37:19 38:3 41:11	165:15	appear 167:15	aspects 24:17,19,21
act 177:21	45:18 46:22 52:14	ahead 95:11 159:22	179:21 186:6	asset 158:12
actions 6:20 138:1	80:2 102:16 114:9	aimé 64:20,21	appeared 65:6	assets 31:2,4,6
138:6	130:20 131:2	all-day 90:19	appears 49:12	154:3
activities 46:16	affiliated 61:12	aloud 64:19	180:2,2,15,22	assignment 14:9
124:2 132:20	affiliates 38:17	ambiguous 164:5	182:17	126:21 127:14
activités 69:15,17	70:6 79:6,17,18	America 166:7	applied 114:4	156:9
actual 128:9	80:2 100:4 102:18	American 153:20	applies 114:9 131:4	assignments 14:10
actuelles 69:16	affiliation 46:17	AMM 99:19 100:11	apply 61:11	121:15
addition 7:21 153:5	80:4 114:12	100:22 101:2,4,15	approximately	assist 10:16
154:2	117:17	101:18 102:2,6	9:12 14:18 153:2	assistant 133:18
address 11:8,9	affilier 37:14	103:6 108:20	April 54:22 138:8	assume 81:16
146:13	affirmatively 84:16	109:20 111:22	aqueous 116:8	149:20 150:1
addressed 76:18	136:19	112:2,22 113:3,7	area 87:1	182:18,22
85:11 180:8	affixed 187:13	113:22 114:4,10	argument 176:19	assumed 100:5
administer 63:17	Africa 147:17	114:16 115:3,4,9	Argumentative	assumption 59:6
administrative	afternoon 178:17	116:20	43:8	astonished 66:2
182:22	agency 76:22 77:5	AMMs 113:17,18	arose 72:15 136:11	ate 58:1
		113:20	163:19	attached 4:13,20

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-599

ESQUIRE DEPOSITION SERVICES

Page 191

5:10 6:7,14,22 7:9 7:14 186:6 attempt 12:9 176:12 attended 153:6 attention 103:18 121:17 attorney 49:16 attorneys 15:10 16:17 17:1 August 1:17 6:15 9:12 75:12 119:18 120:5,6,10 124:19 125:6 144:7 185:12 authored 120:1 127:22 authoring 126:20 authorities 102:3,7 102:22 109:19 117:3 136:2 149:2 150:16 authority 100:20 101:20 177:21 authorization 100:17,19 116:20 122:21 authorizations 102:19 autonomous 177:16 available 19:18 151:16 Avant 69:14 avec 5:2 64:22 Avenue 3:15 11:10 Avi 31:19 121:8 aware 41:6 42:2 78:15 83:15 167:6 a.m 1:18 8:4 9:12 46:4,6 57:3 66:12 72:6	Baach 2:4 3:5 9:10 back 17:6,7 72:14 77:16 87:14,17 95:1,22 96:1 98:6 100:10 107:14 125:9,10 132:2 156:5,12 178:18 background 156:12 170:1,6,10 backs 104:1 badly 18:11 band-aid 63:16 bank 29:12 banks 13:15 based 46:20 Basilio 5:7,13,21 6:5,11,19 36:8,11 36:15,19 37:9 38:5,11,17 39:3,8 39:15,16,22 40:10 62:14 76:11 82:15 82:20 85:21 96:19 97:8 99:7 101:8 101:14 102:6 104:13 106:1 111:4 117:18 118:14,20 132:7 133:18 134:11 135:11 137:19 139:3,9,12 140:4 140:8,11,18 146:18 162:2 Basilio's 134:18 basis 37:22 60:16 77:18 121:22 149:15 175:5 Bates-stamped 4:17,22 5:5,12,16 5:20 6:3,8,16 7:1 7:10,16,22 8:6 bearing 49:18,21 55:12 75:22 85:1 93:21 98:16 110:17 119:10	137:9 144:15 160:12 172:3 179:14 beaucoup 64:20,21 becoming 22:7 Beecham 89:10,11 89:14 beginning 18:19 141:15 172:7 begins 60:5 64:20 68:4 108:2,12 181:10 behalf 3:2,11 177:22 behavior 64:12 BEL 49:18 believe 16:7 17:18 20:14 22:4 23:18 27:15 34:9 35:19 43:3 44:22 48:8 48:13,20 59:1 76:15 91:7 99:15 142:3 146:11 152:13 172:9 175:18,21 180:18 181:14 Belmac 4:16 7:11 7:15,22 39:9,10 40:1 41:8,11,15 41:21 42:3,4,7,11 42:12,19 43:4,6 43:12,18 44:3 45:11,14,18 46:22 47:8 51:15,22 64:3,15 65:2,3,7 65:19 68:10 77:9 77:15 78:7,12,22 80:8,15 83:17 85:12,16,19 94:8 95:15 97:10 110:10 113:13 114:16 115:17 116:11,16 117:5 117:12 118:1,7,8	118:9,11,16,19 124:12,17,21 136:11 138:22 139:5,9 140:5,9 140:22 141:11,19 142:5,6,8 143:6 152:5 155:8,8 156:5,6 159:20 161:11,19 162:7 162:12,17,17 164:6,10,21 166:10,11,14,15 166:18 167:21 168:1,4,5,7,12 169:3,9,14,17 170:2,6,18 Belmac's 57:11 108:19 belong 142:4 belonged 142:5 BEL000548 4:18 BEL000553 4:18 BEL001071 8:7 179:15 BEL051024 5:20 93:22 Benham 5:9 83:6 Bentley 1:9 3:11 8:4 9:6,21 40:10 40:15,18 41:7,12 44:17,20 45:5,17 46:12,15 47:2,7 47:12 57:10 75:10 115:2,9 144:5 154:20 157:3 158:8,12,13 165:12,16 167:9 177:22 180:3 181:3 182:18,22 185:10 188:3 189:3 Bentleys 42:19 154:5 Bentley's 45:8,18	48:16 115:12 153:22 155:1 159:17 164:2,3 best 15:21,21 155:14 better 135:18,19,21 big 28:15 biotechnology 177:7 Bis 108:19 109:11 109:13,14,19 bit 56:12 89:8 175:4 181:10 bits 128:11 board 26:14 29:3,5 29:6,13 30:13 31:7 Bonjour 146:9,15 boss 44:6 45:8,16 135:15 Boston 3:16 Bostwick 66:13 72:7 104:19 141:21 bottom 49:14 51:1 51:16,18 66:10,21 Boudal 5:3 6:11,18 23:8 31:18 54:17 54:20 56:22 79:8 117:16 118:15,20 132:6 133:4 box 76:6 Brazil 34:6 42:21 43:5,7,11,12 131:3,4 147:16 break 12:9,11,15 12:19 45:21 brief 63:15 75:4 briefly 49:8 63:5 67:8 74:21 brings 135:16 Britain 34:3 broad 120:13 154:14 157:1
B				
B 4:10				

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-600

ESQUIRE DEPOSITION SERVICES

Page 192

brochure 139:5,9 139:12 brought 164:1 166:6,15 167:5,22 168:8,11,13 Bruno 31:19 71:6 118:18 bubble 177:6 budgetary 37:4 budgets 27:11 build 159:22 bulk 46:20 bullet 108:9,11,12 109:4,21 business 5:18 33:19 33:22 34:1,10 41:15 46:12 94:3 94:15,19 147:12 B-I-S 108:19	Cared 5:19 carefully 73:1 Carpentier 5:9 6:1 83:8 117:14,22 118:2 148:22 149:4 Carpentier's 150:2 Carta 4:19 case 9:8 65:1 70:8 81:9 96:12 97:1 103:4 112:16 117:18 147:8 151:22 187:10 catastrophe 177:5 cc 5:14,22 6:12 7:5 7:19 85:7 99:4 144:19 ce 69:14 cease 172:12 ceased 171:6 central 135:18,22 CEO 180:22 181:3 certain 58:7 63:18 64:12 104:15 121:16 172:20 CERTIFICATE 187:1 Certified 9:14 certify 187:4 certifying 150:8 cetera 154:16 CEU 23:15 chairman 44:20 86:6 180:22 181:3 chance 76:2 change 74:21 75:5 80:20 106:3,7 115:21 116:4,6,12 116:16,17 117:12 117:20 118:21 132:17 changed 73:19 150:10 changes 103:21	106:4 changing 80:14 82:3 106:3 charge 24:9,19 26:20 36:16 52:13 79:5 80:1 83:7,8 85:18,19 102:17 117:17 118:3 130:13 132:19 133:6 chart 112:7 chief 44:20 chiefs 135:1 China 34:6 132:21 145:20 choice 176:8 choices 174:8 175:15 176:2 Cinfa 115:17 116:12 117:6 circumstances 96:8 140:14 clarify 11:20 29:16 72:17 183:21 clause 142:9 clear 12:2 40:21 86:18 87:20 126:5 153:18 163:1 164:11,19 170:13 clearer 170:13 clearly 104:17 151:5 155:3 164:17 clear-cut 129:21 client 71:15 clients 65:4 115:16 117:5 clone 108:19 close 135:2,16 136:10 142:19 closed 130:15 131:18 135:12 closer 175:4,9 closing 125:3,13	130:1,3 134:12 163:19 Cloud 23:20 91:5,7 92:9 149:11 152:20 CoA 143:5,9 code 165:7 Columbia 2:14 187:21 Combe-Reinhardt 5:22 99:9 Combe-Reinhar... 99:12 combination 101:5 102:10 come 120:20 184:1 comfortably 129:7 136:15 coming 111:17,18 132:7 178:18 comment 86:10 commented 86:8 commercial 24:15 26:22 37:21 39:5 52:12,14 81:20 158:5 commission 135:19 187:15 committee 31:6,13 committees 31:1 common 81:19 communicate 17:2 38:4,10 39:3,7 40:9 47:11,21 48:11 149:2 communicated 38:22 47:16 48:1 48:2 148:11 150:16,20 communication 24:14 26:20 86:11 communications 36:4 39:22 40:5 44:10	companies 13:16 91:16 114:11 120:13 154:9 177:6 company 21:19,20 24:20 32:22 37:20 37:22 39:8 40:10 40:14,17 57:11 72:22 73:5 82:12 82:12 94:5 99:13 111:18 112:15 113:4 115:5 123:7 127:13,19 128:17 135:16 140:2,3,3 148:3 152:1 174:6 174:9,22 177:12 177:14,15 compensated 18:16 complement 154:1 154:2 complete 170:17 186:4 completely 66:4 167:6 complex 112:13 169:19 complicated 151:14 complimentary 158:12 Compound 38:14 42:13 Compra 4:19 Compromiso 4:19 Compte 5:2 computer 128:3,6 concerned 104:16 167:20 concerning 41:22 42:7 52:12 70:22 79:8 108:7 124:21 143:1 153:19 162:7 165:7 177:10,11 concluded 185:16
---	---	---	--	---

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-601

ESQUIRE DEPOSITION SERVICES

Page 193

concludes 185:9	80:15 82:4 83:15	100:21 135:20	99:1 110:22	92:22 127:6
conclusions 6:13	83:20,20 84:2	136:1,3 166:8	119:17 144:7,21	128:14 131:15
68:4 121:18 122:1	contractual 65:21	couple 68:2 132:3	161:7 172:6	152:14 155:6,11
condition 159:18	66:3 164:10	185:1	181:18 185:12	155:19 159:9,21
conditions 53:15,15	contrat 64:22	course 21:10 23:3	186:11 188:22	170:1,9,16 175:9
confidential 6:17	Contrato 4:12	33:6 61:8 65:20	189:22	175:22 177:2
128:13	control 25:19 27:12	117:16 126:2	dated 5:10,15 6:1,6	December 133:15
confidentiality	70:13 132:9	130:13 157:8	6:15 89:22 180:5	134:10 187:16
140:13 154:12	conversation 168:6	164:13	dates 156:5,12	decided 80:21
confirmation	conviction 154:8,8	court 1:1 9:7,16	day 46:6 53:17	132:18
122:20	convince 164:4	10:8,12,16 11:22	64:18 71:20 91:17	decision 82:12,13
conflictual 156:4	176:18	17:7 84:15 87:17	106:18 143:22	83:11 121:7 174:1
consequent 132:4	convinced 153:18	96:1 98:1 125:10	178:12 187:13	174:12,18 176:8
constant 25:18	copies 66:6	136:18	de 4:12,19,19 5:7	decisions 81:3,8,13
consult 13:12	copy 94:3 109:16	covered 66:4	5:13 6:5,11,19,21	81:18,19 172:21
consultant 13:7,10	119:21 128:9	co-development	36:8,11,15,19	173:2,8,22 175:1
18:20 19:4	copying 94:2	157:5 158:4,8	37:9 38:5,11,17	decision-taking
consulting 13:9,19	correct 24:1 25:13	creating 25:16	39:3,8,15,16,22	127:3
14:3,7,14,20 15:9	49:14 54:12,13	crossed 44:13	40:10 62:14 64:22	declaration 150:7
15:20 16:4,8,20	56:17,19,22 75:16	89:13,13	65:1,1,2,3 68:4	deeper 156:7
17:17,19,21	82:15 84:3 90:13	cultural 176:11	76:11 82:15,20	Defendant 1:11
contact 36:12 38:19	96:4,17 101:12,22	currently 12:22	85:21 96:19 97:8	3:11 9:21 10:22
159:15	119:18,21,22	customer 71:10,12	99:7 101:8,14	107:11 184:20
contacted 104:3	137:19,20 144:20	71:12,16,18 72:1	102:6 104:13	Defendants 9:4
content 38:8	144:22 145:1	72:2 79:9 80:22	106:1 111:4	defer 174:13
contents 167:22	161:8 168:4	83:7 135:17 147:9	117:18 118:14,20	define 112:8
183:18	176:16 180:3,4,6	customers 77:12	132:7 133:18	defined 37:2
continue 123:10,18	180:7,9,10,12,16	80:16 103:22	134:11,18 135:11	104:17 147:9
124:3 131:8	180:17 181:1,4	104:15 118:9,13	137:19 138:1,7	defines 114:10
Continued 107:12	182:6,12,15 186:4	c'est 65:2	139:3,9,12 140:4	definite 159:6,7,8,8
184:21	187:5	C-A-N-T-A-B-R...	140:8,11,18	Delaware 1:2 9:8
continues 150:3	CORRECTION	107:18	146:18 162:2	delays 57:8
continuing 65:8	188:5 189:5	C-I-N-F-A 115:17	deal 84:4 120:12	Delie 31:19 71:6
contract 22:20	corrections 186:6	C.A 1:8	127:19 136:2	118:18
24:18 25:8 37:21	correctly 84:1	C.R 6:20 138:1,7	157:3 158:8 171:4	delivery 8:5 34:18
53:13 54:11 65:7	costs 61:11		deals 154:15 157:1	80:22
65:18 78:15,17	counsel 9:18 10:22	D	159:1	department 71:12
79:10,11,13 83:19	107:11 178:15	D 4:10 9:1 24:13	dealt 38:9 71:6	71:18 72:1 79:8
164:14	184:20 187:9	107:1 189:1	Dear 86:5 181:10	133:7 135:19
contracts 24:21	countries 34:3	daily 130:10 174:8	182:3	departments 81:21
25:2 53:21 54:6	126:8 147:13,14	175:5 176:1	Debrégeas 7:7 23:5	147:9
66:6 77:10 78:19	147:15,15,17	dans 69:14	23:6,10,12 26:3	departure 27:22
78:19,21,22 79:3	148:6	data 151:1	26:10 32:6 88:17	28:4,9
79:5,15,22 80:3	country 34:5	date 66:8,15,19	90:13 92:10,11,17	depending 38:8
		75:12 76:8 85:9		

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-602

ESQUIRE DEPOSITION SERVICES

Page 194

79:12	59:11,12 106:9	183:11 184:10	76:10,13,16,18	drafting 126:11,18
depends 79:11	108:21 151:22	discussed 62:9	78:9 80:11 82:14	drafts 53:7 83:19
113:5 114:13	177:15 184:9	65:11 68:12 69:12	84:5,9 85:1,3,5,9	83:20 127:22
deploy 24:10 126:4	difficult 140:12	69:20 89:7 93:5,9	86:3,15 93:20,21	draw 149:14
DEPONENT 186:1	174:10 175:5	130:2,4 153:13,15	98:16,18,21 99:1	Drug 8:5
deposed 11:12	difficulty 94:1	162:17 166:10	101:7 103:12	drugs 34:19
deposition 1:15 2:1	dinner 91:13	168:4 175:14	105:19 110:12,16	du 6:21 11:10
9:3,9,14,17 11:16	dinners 91:17	discussing 15:1	110:17,18,20	70:14 77:1 138:2
33:7 49:1 50:7	dire 65:2	68:15 92:17	111:1,15 119:10	151:12,12
55:4 75:1,6 84:17	direct 44:13 103:17	134:15 162:11	119:12,14,17,21	Dubois 27:15,18
93:14 98:9 107:3	121:17 127:5	discussion 30:4	120:1 121:22	28:20
119:3 136:20	132:9 148:22	58:17 65:15 70:2	122:15 126:14	duly 10:20 107:10
143:17 144:1	directed 97:8 111:5	124:20 125:7	128:10,12,17,21	duties 21:22 22:17
160:3 171:15	direction 31:2	153:17 157:20	129:2,22 137:3,8	24:6 25:12,15
179:7 185:16	32:17 60:22	173:17	137:10,12,18	27:3,9 84:1 120:8
des 6:13 60:6 69:19	157:17	discussions 65:20	138:22 139:22	D'autre 108:2
describe 14:19	directly 17:2 26:4	65:22 130:8,12	140:1 144:13,15	d'embaucher 69:19
15:12 16:19 21:22	26:12 102:10	134:12 136:10	144:17,21 160:11	d'Ethypharm
22:17 24:6 30:16	119:15 120:14,20	142:22 155:2,4	160:13,21 161:7	61:18
63:5	125:22	158:4 165:2 166:2	171:19 172:2,5,11	D.C 1:16 2:7 3:7
described 17:20	director 19:5,11,15	166:6 167:8	179:5,14,14,16,18	9:11
31:13 32:3 81:4	22:2,8 23:8,9,14	183:19	180:1,2,15,19	D.M 3:4
90:6 159:2 161:14	23:18,22 24:7	dismissal 95:13	181:18 182:20	déembaucher
describes 22:20	26:5,18,19,19,21	96:8	185:3	69:14
140:1	27:4,14 32:22	dismissed 86:9	documentation	définissions 69:15
description 63:15	35:8 36:17 37:12	95:15 96:11,14	149:15	
designated 52:11	38:3 39:13 43:2	dismissing 136:7	documents 22:15	E
detail 122:18	43:16 44:4,5	distance 145:21	49:8,11 53:16	E 3:1,1 4:1,10,10
164:17	52:14 78:6 86:7	distributed 46:18	128:11,22 129:20	6:10 9:1,1 107:1,1
detailed 170:1	92:12 121:6,8	147:12	129:20 148:11	107:1 188:1,1,1
determination	127:18 132:18	distribution 27:12	150:15,17,18	189:1,1,1,1
29:11	170:16 174:5	District 1:1,2 2:14	151:9	earlier 54:10 73:9
develop 156:9	directors 26:14	9:7,8 187:21	document's 133:20	83:22 89:2 108:5
developed 34:20	27:2 29:3,5,7,22	dive 166:20	Dodge 3:14	125:20 152:6
157:4	30:14 31:2,8	DMF 112:1,3,5,11	doing 13:8 49:9	175:13 179:2
developing 25:16	91:16	112:14 150:20	55:10 84:8,22	easier 12:8 136:2
153:19	disagreed 173:3	document 5:18	177:8	east 147:16
development 31:21	174:1	22:13,17,19,19	doubt 54:21 103:1	eastern 147:16
39:6 46:16,19	disagreement	49:13,18,20 50:9	152:5 175:4	Edition 143:5
155:1 158:4,21	172:20 174:12	50:13,16 53:1,5	downward 73:19	Edwards 3:14
166:7 168:10	discovered 64:17	55:3,10,12,14,17	Dr 111:10,18	effect 155:19
diet 58:8	discrepancy 59:14	55:20 56:3,9	112:16	effort 176:18
difference 29:11	discuss 12:19 27:21	58:11 59:19 67:16	draft 7:21 158:22	eight 39:20 48:3
different 34:21	87:3 92:9 183:6	75:19,21,22 76:8	drafted 127:8	either 52:8,13
				67:19 68:16 79:5

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-603

ESQUIRE DEPOSITION SERVICES

Page 195

88:17 90:12 92:16 116:17 141:10 155:10,15,19 158:10 169:22 170:8,15 element 165:8 167:8 elements 149:16 elevator 13:14 elevators 13:14 emotion 35:6 employed 12:22 13:3 18:21 19:1 29:3 30:9 31:14 32:4,9,10,12,18 32:19 34:13 35:1 36:3 37:7 38:5 39:4 40:1 41:5,13 44:11,15 45:6 46:10 47:12,15,22 48:18 50:10,13 53:8,22 61:14 71:8,8,20 73:19 76:17 78:5 79:16 83:16 89:19 95:8 102:7 120:15,19 127:11 130:5 162:12,18 177:20 187:9 employee 99:16 101:11 149:5 employees 31:1 35:18,22 36:20 73:10,15,19 employer 13:5 employment 22:10 23:2 34:15 35:22 48:6 171:11 en 69:16 enact 24:10 25:12 encountered 88:16 163:21 ends 74:22 143:16 185:8	England 113:19 English 4:13,20 5:11 6:2,7,14,22 7:9,14 10:12,13 11:13 13:2 18:2,5 18:8 33:17 35:4 37:15 50:18 51:2 55:15 56:15 58:15 60:7 66:18 67:6 68:5 69:3 73:21 76:4 80:9 85:4 88:7 94:4,8 95:3 96:6 97:17 101:21 102:14 103:13,19 107:21 108:4,16 109:7,14 111:4,6 114:2 115:15 119:13 120:18 121:20 137:11 139:13 143:15 151:6 155:13 159:11 160:17,22 163:7 176:3 179:17 ensuite 69:17 entailed 15:13 enter 156:7 entered 66:13 83:16 104:19 141:21 165:2 enterprise 30:22 112:15,17,21,22 115:13 117:1 enterprises 135:1 enthusiastic 182:11 entire 61:2 127:11 128:12 133:6 137:2 entities 51:3,7,18 51:20 151:22 Entitled 50:16 entity 33:8 151:13 entry 56:14 57:18 58:1,12,18 68:8	68:19 envisioned 165:11 EP 5:1,1,5,6,12,16 5:17 6:4,4,9,16 7:2,2,10,17,17,22 8:1 49:21 55:13 76:1 85:2 98:17 110:17 119:11 137:9 144:15 160:12 172:3 equal 183:4 equipment 140:22 141:11,19 Eric 23:7 31:18 120:2 Errata 186:6 es 65:3 escape 25:10 escapes 37:14 Espagne 6:21 61:18 138:2,8 espagn/Portugal 70:15 ESQ 3:4,13 Esquire 9:14,17 essential 167:7 est 69:18 established 74:3 122:1 133:13 estimate 15:21,21 39:14 et 5:3 69:15,17 154:16 Ethyparm 1:5,6 3:2,3 4:17 7:5 9:5 9:5 10:2 13:20 14:4,7,10,14,20 15:10 16:4,9 17:21 19:5,6,8,9 19:12,15,18 21:17 22:2,8 23:1,13 24:1,8 25:1,20 26:5 27:4,7,14,18 27:19,22 28:1,4	28:19 29:2,4,7 30:9,11 31:14 32:5,9,21 33:5,7 33:10,19,20 34:1 34:2,4,16,21,22 35:1,9,15,17,18 36:1,4,5,12,15,20 37:8,9 38:6 39:4 39:13 40:2 41:5 41:14,21 42:3,4,7 42:12,12,17,18,21 43:2,5,6,11,11,12 43:17 44:12,16 45:6 46:11 47:13 47:15,22 48:7,19 50:10,13 51:15,21 51:22 52:2,7,12 53:8,22 59:3,8 60:21 61:14 71:8 71:8,11,11,21,22 72:1,15 73:5,10 73:11,15,16,20 75:10 76:17,19 77:16 78:6,7 79:2 79:16 81:10 82:8 82:9,21,22 83:16 83:17 89:19 96:14 99:13,16 100:2,3 101:12 102:8 104:4 105:12 110:1,4,8 112:19 113:6,15,16 114:4 117:10 120:15,20 121:5 124:20 125:3,7,14,17,20 126:5,18 127:12 129:8 130:1,3,5 130:14 131:17 132:9,19,20 133:13 134:12 135:3,12 136:10 138:14 140:8 141:12 142:4,7,10 142:16 143:1	144:5 145:18 147:12 149:6 153:19,22 154:3 154:19,22 156:10 158:8,10,14 162:13,18 163:19 164:3,11 165:12 165:16,17,18,22 167:8,21 170:17 171:7,8 172:13,18 174:2,3 176:13,18 177:7,20 178:20 181:22 183:1 185:10 188:2,2 189:2,2 Ethyparm's 16:17 35:21 165:19 171:11 Ethyparm.es 146:5 Ethyparm@Et... 146:2 Euro 16:6 17:18 62:6 European 101:4 event 58:3,5 170:22 eventually 21:1 everybody 28:16 evolution 129:21 evolutions 69:13 evolve 127:14 exact 36:18 45:9 57:16 89:4 119:19 exactly 41:20 48:8 65:22 88:18 96:17 155:15 EXAMINATION 4:2 10:22 107:11 178:15 184:20 examined 10:21 107:10 186:3 example 63:18,19 81:9 114:3 135:17 152:4
--	--	---	---	---

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-604

ESQUIRE DEPOSITION SERVICES

Page 196

exception 34:4 71:4	explaining 77:18	fax 5:7,13,21 6:5	77:20 81:14 82:18	focus 88:9,12 89:18
exchange 174:19	explanation 89:4	86:11 179:21,22	87:11 97:22 109:5	follow 132:4
177:4,14	96:20 97:4,4	179:22 180:2	114:6,17 116:7	followed 148:12
exchanged 94:19	exploit 114:12	181:12,15	128:4 133:20	follows 10:14,21
exchanges 48:13	exploitant 151:19	Fe 32:11,13,16,17	173:9 174:15	86:4 107:10
executive 44:20	151:21	32:18	178:4,16,20	follow-up 132:8
exemption 71:5	exploiting 112:14	fears 70:7	180:14 181:6	foregoing 186:3
exhibit 4:11 49:1	112:17,21 115:13	February 16:13	182:21 183:9,14	187:3,5
49:17,20 50:2,12	117:1 152:1	Feel 137:2	184:5,7,15,19	foreign 71:1
50:15,20 51:1,17	exploits 113:4	feeling 154:19	fini 151:13	forget 34:7
52:8,8,20 53:3,7,8	exported 77:9 78:7	167:20	finished 13:17	forgot 26:22 95:15
55:4,8,12,21	expressed 70:7	fees 61:7	150:7 151:11,15	form 118:18
56:14 58:11 66:11	extent 14:22 16:21	Fenal 31:20	fire 36:20 37:2	formal 22:19 23:6
66:17 67:7 68:3	e-mail 7:3 38:21	Ferrer 104:2	fired 96:17 172:16	formula 67:8
69:4 75:6,16,22	145:2 146:1,1,8	fewer 91:1	firing 37:5 96:21	103:21 106:3
76:6,21 80:5,6,11	146:13,15	FF 61:19	97:5	116:9
80:13 84:7,17,21		Fifteen 35:4,5	firm 135:4	formulation 80:20
85:1 89:2,20	F	figure 64:7,16,17	first 10:20 11:6	105:1 106:7 116:5
93:13,14,18 95:1	F 2:5 3:6 4:10 9:11	figures 59:2,9 61:1	14:13,21 15:9,20	116:6,9,18
98:8,9,13,16	107:1	64:16 130:22	16:5 20:8 22:4	found 133:19
99:19 107:3,15	Fabricación 4:12	131:1 147:11	31:10,16 48:22	foundation 26:17
110:13,16 111:8	fabricant 151:12	177:11	49:13 51:17 56:13	82:18 114:7 128:4
112:12 115:14	fabrication 123:18	file 112:2 149:3	58:22 61:17 68:8	180:13 181:5
117:21 119:2,3,8	fabriquer 65:3	files 121:16	71:20 76:21 77:8	183:16
119:10 132:2	facilities 65:9	final 74:4	86:2,13,22 88:2	four 13:11 14:4,8,8
136:16,17,20	110:11	finance 24:13	88:12,15,21 90:5	14:11,18 17:22
137:8 138:19,21	facility 135:17	financial 23:7	90:12 91:6,12	22:9,15 25:9
144:1,11,14 160:2	facsimile 8:2	26:18 121:6,8	92:2 93:6 94:16	39:17 48:9 115:6
160:3,7,11,16	179:18	154:4 176:22	99:18 102:15	126:3 133:14
161:2,15,18 163:2	fact 23:21 42:17	187:11	103:5,6,20 104:6	fourth 115:14
163:5 171:14,15	43:13 64:13,14	find 67:18 128:16	111:8 116:22	117:21
172:2 179:6,7	70:11 95:15	168:16	121:18,21 125:8	framework 37:1,2
exhibits 48:22 49:6	104:16 113:9	fine 3:4 4:4 10:1,1	126:2 137:3,4	37:3,4,5 80:3
49:6	123:21 134:8	14:22 15:4,6	138:19 139:3,18	112:2 124:17
existence 100:8	factory 47:8,9	16:10,21 20:10	146:8,14,21 152:7	France 1:5 3:3 9:5
existing 126:8	fair 90:10	26:15,17 29:16,20	152:10 160:8,16	11:11 19:6,9
exists 21:20	fait 64:21	30:18 34:11 35:10	160:18 161:15	32:17 42:12 52:7
exited 72:7	far 37:11 80:2	38:14 40:3,6,19	163:1,5 169:7	83:17,21 95:9
exotic 147:1,9,15	110:6 142:3,8	42:13 43:8 45:20	174:4 182:4,17	105:2,16 106:6,10
147:15	156:19 166:1,8	47:4 49:12 50:5	five 35:19 36:2	122:21 132:21,21
expires 187:15	fashion 37:21	51:8 54:1 59:10	39:18 48:3 73:10	140:8 141:12
explain 37:18 112:4	52:19	59:13,17,19 60:11	73:15 84:14 115:7	149:5,10 151:12
122:13 164:15	fast 127:14	60:15 63:2,7,10	147:12	188:2 189:2
explained 108:5	faster 149:12	63:11 67:15 77:17	flash 71:2,5 118:18	francs 62:5
	faut 69:15,18			

ESQUIRE DEPOSITION SERVICES

Page 197

frankly 58:20	96:5,8,17	113:19 130:21,22	24:1,8,10,11,12	handle 121:15
Frederic 31:20	Gasca's 96:21 97:5	getting 117:11	24:19 25:13,17,21	handled 135:20
free 137:2	97:9	give 11:7,15 31:9	26:6 27:4 30:9	handwriting 49:16
French 10:13,13	geared 122:16	89:3 97:4 113:21	32:2 34:21 35:1,9	happen 154:9
51:6 56:20 57:1	Gemini 32:20	126:7	37:6 39:13 41:6	177:17
60:6 61:22 62:2,5	general 11:10 19:5	given 103:20 186:5	42:17 43:3,17	happened 21:6
69:13 76:12 77:4	19:11,15 22:1,7	gives 168:14	53:13 60:22 61:2	22:5 58:6 70:9
78:14 86:1 89:21	23:14,18,22 24:7	Glaxo 104:2	70:12 78:6 82:8	92:13 94:18
94:7,11 95:5	26:5 27:4,14	global 61:5 73:4	82:21 83:2 102:11	happening 108:6
100:12,15 107:19	32:17,22 35:8	81:18 82:12	103:3 113:15	happens 135:3
108:10,14 110:19	36:17 39:13 43:2	113:20 164:2,10	114:9 121:6	head 11:22 15:4
111:7 119:5 125:5	43:17 52:10 53:18	165:4,15 166:1	132:19,20 133:6	heading 138:22
133:5,16 139:2,20	56:6 61:7 78:6	174:8 175:15	149:9 154:3	hear 20:3 28:8 44:7
144:16 145:6	86:7 92:12 120:7	176:1,8	165:12,18 170:17	87:14 95:21 97:19
148:15,19 150:5	120:9,11 121:9	globally 71:11	groupe 69:14	98:6 125:8
160:10,14 163:6	127:18 155:18	122:10,12	groups 43:11	heard 20:18 30:13
163:11 165:6,9	164:4,7,14 170:16	go 29:18 46:1 59:22	GS 68:19,20 69:2	40:14,16 44:19
179:9 181:11,19	171:2 174:5	60:13 63:10 67:12	guarantee 183:1	64:6 124:8
182:16 183:3	generally 35:12	74:20 89:6 95:11	Guggenbuhl 7:3	hearing 20:2
frequently 38:4,8	52:18 73:1	106:12 127:22	145:3	hearsay 28:7
39:4 94:19 166:13	generic 108:20	136:4 143:14	guidelines 11:15	held 2:1 9:9 30:4
front 84:11 107:15	109:17	149:12 157:17	gynecologic 63:20	173:17
121:21	gens 69:19	158:20 159:22	gynecology 63:20	hello 146:9
fulfill 28:12	gentlemen 162:6	164:4 173:9,13	G-E-R-M-A-I-N	hereunto 187:12
full 11:3	Gerard 164:16	178:7	11:6	Herrera 5:14 44:8
function 25:4	Germain 1:15 2:1	goes 142:8 183:5	G-U-G-G-E-N-B...	44:11 57:9,19
121:11,11,13	4:2,11 5:3,8,15	going 45:22 60:15	145:4	58:12,17,19 68:16
173:1	6:1,6,12,18 7:6,13	72:4 89:3 91:8	Gérard 7:18 19:21	74:14,18 85:12,16
functions 24:12	8:3 9:4 10:19	100:10 103:19	25:5 26:2 32:6	90:2 97:9 162:3
37:12,19 38:2	11:2,5 12:22 18:2	108:18 109:5	52:17 79:6 159:9	177:21
140:1	18:16 30:8 46:10	124:2 137:4 148:7	167:7 184:2	hidden 106:2
further 164:5 168:9	49:1,5 50:2 54:14	171:18	H	higher 130:22
178:2 184:19	55:4 75:1,6,9,15	good 11:2 136:8	H 4:10 5:22 188:1	hindered 166:19
185:6	84:17 86:7,10	178:17	189:1	hire 36:20 37:2
future 93:10	93:14 94:2 98:9	government 101:3	half 16:15 24:5	hiring 37:3
futures 69:13	98:12 107:3,8,14	101:16 102:3	91:3 93:1 171:9	historical 156:11
F-E-R-R-E-R	111:6 119:3 122:2	148:13	hand 24:16 74:1	164:21 169:20
104:2	136:20 143:17	governmental	78:18 95:18 127:1	170:22
G	144:1,5,10 160:3	100:20 101:15,19	144:10 152:2	history 155:8
G 7:12 9:1 67:12	171:15 173:21	102:7	159:15 183:20	honestly 64:18
107:1	178:17 179:7	Great 34:3	187:12	hope 140:12
galanic 34:19	180:8 185:2,9	grounds 109:6	handed 49:5 55:8	hotels 13:15
Galligos 31:19	186:2	group 19:7,8,12,15	93:17 98:12 122:1	hour 90:21
Gasca 86:9 95:4,6	Germany 34:3	19:18 22:2,8 23:9	160:6	hours 91:1,3 93:1

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-606

ESQUIRE DEPOSITION SERVICES

Page 198

182:10 185:13 house 131:6,7 human 24:14 26:21 73:2 humor 157:16 humorous 157:6 hundred 71:13 100:6 Huntington 3:15 hyphen 147:18 hyphenated 150:6 hyphens 146:22 Hélène 5:9 83:8 117:14 148:21 150:2	113:8 115:3,11 123:21 146:18 imagined 106:6 imagining 157:7 immediate 147:1 immediately 19:3 125:20 146:21 impact 127:5 imperative 83:11 implementation 155:3 implemented 148:8 importance 29:1 154:18 important 12:3 53:19 60:8 64:16 72:9 126:9 important 60:6 impossible 89:12 102:18 138:17 improve 34:19 60:22 169:3,9,14 169:17 include 19:8 25:16 27:5 145:14 includes 82:7 including 150:22 150:22 income 183:2 Incorporated 9:7 increase 15:16 independent 136:15 India 34:6 111:9,17 132:21 145:20 Indian 111:19 indicate 9:19 indicated 73:14 90:11 indicates 57:9 80:13 121:21 123:17 124:10 125:2 indicating 66:22	individual 44:7 individuals 30:10 31:17 52:22 53:4 126:17 industrial 15:15 23:9 26:19 61:7 79:9 81:20 132:18 133:7 Industries 132:10 industry 13:14,14 13:15 20:5 21:14 24:13 135:4 informal 23:6 information 38:21 149:3 168:15 informed 37:6 infraction 133:21 initials 56:17,18,21 insight 159:20 insist 97:18 installations 135:2 installed 126:6 insufficiently 126:8 intellectual 24:22 25:2 151:14 intelligent 153:20 157:19 intended 34:19 interacted 118:20 interactions 43:18 interdiratá 65:2 interest 59:9 130:20 165:3 166:20 187:10 interested 128:19 intermediary 47:7 internal 7:15 161:5 international 101:6 Interne 7:11 161:10,19 Internet 177:6 interpret 10:12 interpretation 105:19	interpreted 10:13 interpreter 3:21 10:4,6,9,15 13:4 15:2,5 29:8 35:5 37:13,16 40:4 47:14 49:4 59:11 59:16,18 60:12,17 67:14,18 72:17 73:22 98:2 107:22 109:9 138:4 141:7 151:4,8 160:18 162:14 165:20 167:2 168:22 176:5 Interpreter's 29:8 interviewed 23:17 inter-global 165:3 introduce 9:18 174:18 introduced 88:16 90:12 93:8 152:12 investments 127:4 involve 15:9 involved 52:7,22 53:4 81:2,12 117:22 118:6 126:18 134:11 164:20,21 171:2 177:6 issue 68:11 69:11 69:20 72:14 78:20 130:1,3 136:11 168:4 issued 100:20 101:2 101:19 issues 58:18 162:12 Italy 34:3 item 56:13 57:9 69:10 70:4,14 78:10 80:13 82:2 107:17 123:6,9,17 124:10,14 125:2 132:6 133:11 134:8 138:21	139:14 140:11,20 143:5 items 122:9 132:4 I,PIERRE 186:2 <hr/> J J 7:13 57:19 58:19 James 5:19 7:19 8:2 94:9 180:11 180:16,19 Japan 34:6 114:3,5 166:7 Jim 57:10 58:12 164:16 Jmingolla@capd... 3:18 Joannesse 7:20 25:9 52:17 job 1:20 12:8 21:8 21:14 22:20 28:12 28:13 joining 28:19 joint 154:15 157:5 158:17,17 165:10 joke 157:18,22 158:3 Jonathan 3:4 10:1 178:20 Jonathan.fine@... 3:9 Joseph 3:13 9:20 June 7:20 juridique 65:1 justify 168:15 <hr/> K keep 84:9,10 kilometers 71:13 kind 13:6 knew 21:19,19 27:1 37:11 40:16 45:15 64:15 157:19 170:21 know 11:19 12:15 19:22 21:5,12,14
--	--	--	---	---

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-607

ESQUIRE DEPOSITION SERVICES

Page 199

21:16,17,21 22:9	165:13 168:16	20:16 21:2,9,18	81:18 101:6	79:17,18 101:4
23:10 25:22 27:13	172:11 173:10,21	21:22 22:6,22	102:20 135:22,22	102:20,22 113:20
27:16,17 28:10,14	177:8 179:20	23:16 25:5 26:2,9	142:20 166:5	113:22 114:12
29:2,22 30:12	181:20	28:19 32:6 52:17	167:6 174:8	135:18,22 142:20
33:7 34:8 35:18	knowledge 156:13	79:6 88:17 90:13	levels 67:12	149:2
35:22 36:10,14,19	known 20:5 95:14	92:10,11,17,22	Lewis 2:4 3:5 9:10	located 9:10 23:19
40:12,20 41:20,20	100:6 135:1	127:6 128:14	life 73:4 128:6	34:5 71:13,19
44:16,18 45:5,12	<hr/> L <hr/>	131:12 152:14	lifetime 128:16	72:8
45:13,15,19 47:2	la 6:21 68:4 138:2,7	155:5,10,20 159:9	light 183:22	logic 131:13
52:4,6,21 53:2,3	lab 103:4	159:18,20 162:11	Lily 3:21 10:6,11	logical 131:11
55:21 58:16 62:3	Laboratorios 4:15	163:10,17 164:4,7	limited 118:11	long 13:8 14:13,17
62:14,22 64:5	4:16 39:8,10 40:1	164:16 167:1,7	line 108:21 137:15	16:14 21:4 22:13
66:18 68:22 71:7	41:7,15 43:4,6,18	168:21 169:22	137:21 161:10	24:3 32:12 61:13
72:10 73:2,18	44:3 45:11,14	170:9,15 171:2	188:5 189:5	90:16 97:12
74:1 76:2 77:4	51:14,15,21 83:17	175:11,22 176:12	link 136:12,14	106:10 122:19
78:6 79:2 80:3,10	113:13 114:16	176:17 177:2	linked 86:17	129:13,16 136:4
80:12 81:12 82:6	136:11	184:2	132:22	153:9
86:5 88:13,18	laboratory 83:12	left 35:21 51:21	Liorzou 5:3,8 6:12	longer 12:9
89:11 92:2,7,16	111:19	73:14 132:1	6:18 31:19 52:15	long-standing 66:3
92:22 93:10 94:21	labs 115:7	171:10 172:7,14	54:17,20 56:6,19	look 137:2 140:20
95:6,8,12,19	Lacer 104:2	174:3,11	71:4 79:7 83:6	181:9,17 182:3
96:10,11,13,15,16	lack 164:7,15	left-hand 51:14	117:14 118:14,20	looked 80:6,6 89:2
96:18 97:3 98:3	large 61:9 127:18	legal 9:15 24:17,19	161:6 162:2	160:15
99:10 100:13	lasted 90:17 153:10	24:21 52:16 79:7	liquid 67:8 68:9	looking 56:13 86:2
101:14 102:5,9,9	late 57:7	112:10 115:12	116:9	137:6 138:21
102:14 103:9,16	Laurence 7:3 145:3	117:8 120:12	lis 108:12	lot 103:15
104:21 105:3,8,20	law 9:9 135:4 152:5	lengthy 12:11	list 99:13 106:10,10	lower 72:22
107:20 109:13	laws 38:1	93:19	listed 51:4,18 66:15	luckily 127:17
110:6,11 112:4	lawyers 12:18	les 148:17	66:19 76:5 85:7	lui-même 65:3
113:9,11,12	layoff 133:14 134:7	letter 4:21 6:10,17	94:6,13 99:1,3	lunch 91:8,10,12
114:15,22 115:1,8	le 7:11 64:21 69:14	7:18 85:11,20	110:22 119:20	luncheon 106:16
115:11 117:7,10	70:15	99:4,6,8 111:3	137:14 144:19	lunches 58:6 91:16
117:21 118:5,16	leader 44:5 148:22	150:20 179:21	162:1	l'Agence 77:1
118:19 120:1,8	leading 45:16 53:12	181:10	listen 28:7	l'Espagne 6:14
121:2 123:1,8,14	learn 19:17 28:3	let's 29:18 39:16	listing 177:3	
128:18 129:1,8,13	learned 156:20	46:1 59:22 74:20	literally 88:21	<hr/> M <hr/>
131:17,22 134:9	learning 64:2 96:7	88:8,8,12 103:17	little 14:15,15 18:3	M 7:13
134:18 135:7	leave 141:9 172:15	106:12 114:3	18:6,9 56:12	machines 142:4
139:19 140:7	172:18 174:1	139:14 140:20	68:20 89:8 104:1	Madam 117:22
141:3 142:1,1	leaves 28:11,17	143:14 169:7	104:1 148:5 175:4	149:4
143:9 145:7 146:5	leaving 28:20	171:13 173:13	181:9	Madrid 33:14
146:17 147:7	Leclerc 11:10	178:7	live 11:9 175:5	54:16 56:10
149:20 151:13	Leduc 7:12,18	level 24:20 31:5	LLP 3:14	125:18
152:1 164:6	19:21,22 20:6,8	53:16 61:1,5 81:9	local 38:1 52:14	magical 38:20
				mail 48:13 148:10

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-608

ESQUIRE DEPOSITION SERVICES

Page 200

main 25:5 45:8 53:18 60:20	132:8 133:1 141:11 154:4	38:1 39:15 42:4 48:1 59:2 61:6	91:4 92:3,13,15 92:18 93:5 94:16	mettions 69:16
maintain 140:13	March 48:18 54:17	63:10 64:9 70:21	152:11,19 153:3,7	microgranules 65:8
maintained 121:14	54:22 56:11 57:13	71:2 83:5,18	153:9,13 156:15	micrograules 65:3
major 174:3	61:13 62:9 64:3	109:10 122:11	156:16,18 161:11	middle 171:12
making 74:13 81:2 81:13	65:11 66:9 67:3	124:1 132:20	161:14,16,19	million 61:19 62:5
man 89:8 91:15 96:13 157:19	68:12 69:21 72:13	141:5 142:18	162:2,7,10,21	mind 45:20 64:19 88:10 97:14
manage 72:22	74:5,14 89:22	148:7,22 151:8	163:2,9,14,16	Mingolla 3:13 4:3 9:20,20 11:1
managed 24:11 177:14	90:7	157:14 159:10	164:18 168:3	16:11 17:3 20:12
management 27:11	marché 70:15	164:1 165:13,17	184:11	29:18 30:7,19
30:10 31:1,12	mark 84:12 160:1	169:5	meetings 22:6	34:14 35:13 37:17
52:16 79:7 81:1	marked 48:22 49:2	meaning 148:4	28:18 38:18 48:10	39:1 40:5,8 41:1
132:18 133:12	55:5 66:11 75:7	168:16	87:7,7,9,13 88:9	42:15 43:15 45:22
173:1	75:16 80:11 84:7	means 24:13 30:12	152:7,17 159:12	46:9 47:5,15,18
manager 23:9	84:18,21 93:12,15	62:5,12 63:6,15	member 29:6 31:10	48:21 49:15 50:1
52:15 64:8,10	93:17 98:7,10,13	64:10 65:13 69:6	31:11 136:6 150:1	50:8 51:11 54:3
149:1	107:4 110:13	70:1 79:9,10	members 26:13	55:2,7 59:20,21
managing 100:2	119:2,4 136:21	110:9 113:15	31:12 64:11	60:18 63:4,8,13
manner 52:10 80:22	144:2,11 160:4,6	147:11 150:17	Memorandum 7:15	66:14 67:20 68:1
Manu 50:16	161:1 171:13,16	155:1	memory 14:18	72:19 73:7 74:20
manufacture	179:6,8	meant 83:5 109:11	35:20 36:22 41:11	75:14 77:19,21
109:16	market 100:18	157:2	44:4 85:18 91:6	78:4 82:1,19 84:6
manufactured	102:19 103:22	mechanically 129:6	95:17 113:16	84:10,19 87:14,19
34:20 41:19 46:18	131:6,7 147:20	medication 34:18	162:22 163:20	93:12,16 95:21
105:4 106:9	marketing 158:20	34:18 63:18,19	172:9 183:18	96:3 97:19 98:4
109:22 123:20,22	markets 147:2,9,11	76:22 77:7	mention 162:14	98:11,20 104:20
124:1	147:16 153:20	meet 20:19 21:1	mentioned 42:6,20	106:12 107:13
manufacturer 42:8	Mars 5:4	48:6 92:14,15	56:2 57:16 58:5	109:12 114:14,20
109:17 122:21	Massachusetts	meeting 7:16 20:22	65:12 73:3 82:11	116:10 119:1,6
150:7 151:12,20	3:16	21:4,7,18 22:2,4,5	96:12 101:18	125:8,12 128:7
151:21 152:2	Mateo 86:8 95:4	54:14 55:19 56:10	105:15 112:3	134:1 136:17
manufacturers	material 61:9	57:12,16,18 58:12	120:2 134:8 148:4	137:1 138:11
113:4	111:16,17,17,20	58:19,22 59:1	150:19 154:14	143:14 144:9
manufacturing	112:1,8 116:18	60:9 62:9,11,15	156:22 157:1	151:10 160:1,5
4:14 13:16 41:22	142:8 148:5	64:3,6,8,11 65:11	158:16,19	162:16 165:21
47:3 50:16 65:8	materials 145:15	65:15,18 66:6,8	mentioning 124:8	167:3,10 169:1
77:11 80:15 82:3	matter 9:5 75:10	68:12,17 69:12,21	menu 91:22	171:13,17 173:12
104:5,16,21 105:4	131:3 144:5	70:10 72:14 73:4	Merci 119:5 179:9	173:20 175:7
105:10,15 106:5,6	149:13 156:7	74:5,8,11,15,18	Mercredi 5:4	178:2 179:2,10
116:18 123:10,15	185:10	76:22 86:6,8,14	merging 157:17	180:13 181:5
	matters 15:1	86:14,19,20 87:3	Messrs 26:9 54:17	182:19 183:8,13
	mean 13:21 26:13	87:6,21,22 88:2,5	met 57:14 91:12	183:16 184:13,22
	26:18 29:12 30:20	88:12,14 90:1,6,7	96:5	185:6
	34:12,18 37:19,20	90:12,16,19 91:2	methods 150:9,22	

ESQUIRE DEPOSITION SERVICES

Page 201

Minimum 38:7	17:16	Murphy's 167:11	124:7 128:6	143:16 144:4
minute 126:2	monopole 70:14	180:21	142:17 146:13	156:22 158:11
minutes 55:19 56:7	month 38:7 67:2	mutual 101:5	155:2,9 156:6	165:1 172:21
65:12 70:1 82:11	months 14:8,8,18	Médicament 77:1	164:3,4 166:1,8	185:8
94:17 97:2 159:2	16:15,15 61:16,16		170:13,13 174:21	numbered 99:18
Mischaracterizes	126:3 172:19	N	178:1	100:10 132:4
20:10 35:10 87:11	morning 11:2 60:9	N 3:1 4:1,1,10 9:1	nevertheless	numbers 49:18,21
misheard 87:15	152:6 178:19	107:1,1,1 189:1,1	114:12 173:7	137:9
misreads 182:20	move 174:14,15,16	name 9:13 10:6	new 46:20 62:18	numerical 59:9
missing 27:2	MRP 103:6,9	11:3,5,5,6 20:2,2	92:11 116:19	nutshell 46:19
mission 156:9	multipage 49:17,20	20:3 21:19 25:6	147:2	113:14
missions 121:15	137:8 172:2	33:3 37:13 76:5	night 136:4	n'a 64:20,21
mistake 142:14,14	multiple 102:3	77:10 78:7 94:9	nine 119:2	n'ayons 64:22
146:11 174:20	multitude 147:14	94:13 99:12 100:7	Nodded 84:15	N-O 159:10,11
177:1	Murphy 5:19 7:13	111:18 112:22	136:18	N.W 2:5 3:6
mistranslating	7:19 8:2 43:21	113:3 114:19	nods 11:22	nécessaire 69:19
29:15	44:3,16,19 45:5	115:4 123:7	normal 28:10 37:21	O
Mm-hmm 50:18	45:10,13,16 47:17	129:14 137:14	91:2	O 4:1,10 9:1 107:1
51:2 56:15 67:6	47:22 48:6,11	145:3 159:6	Normally 52:11	107:1,1 189:1
68:5 80:9 91:18	57:10,12,14,19	178:20 180:21	Northwest 9:11	obeys 37:22
94:4 95:3 101:21	58:13,16,19 68:16	names 25:9 27:2	nos 49:1 55:13 69:5	object 60:15 101:5
114:2 115:15	74:7,11 86:7,8,16	32:8	69:15 85:2 98:17	109:5 153:16
117:15 126:1	86:19 87:3,6,21	natural 127:15	160:12 172:3	183:13
130:9 135:6	88:14,16,22 89:7	nature 33:19 41:15	notably 127:6	objecting 59:13
149:22 151:18	90:2 91:9,11 92:4	46:12 65:21 79:10	notarial 187:13	objection 14:22
160:17 163:7	92:8,14,16,19,21	79:11,12 158:5	Notary 2:14 187:1	16:10,21 20:10
176:7	93:5 94:10,16	176:21	187:20	26:15 30:18 34:11
mode 173:1	95:16,19 96:9,10	necessarily 126:6	note 7:11 29:9	35:10 38:14 40:3
modification 81:17	97:3 152:8,12,18	148:7 154:5	157:6 161:10,18	40:6,19 42:13
Moi-même 111:7	152:20 153:6,8,17	need 12:14 98:6	noted 78:1	43:8 47:4 50:5
molecule 115:5	154:11,12 155:5,7	116:19,21 150:15	notes 161:5	51:8 54:1 63:2,7
moment 25:11 30:1	155:12,20,22	150:19 177:18	notice 133:14	67:15 77:17,21
49:7 75:18 84:20	156:14,16,20	needed 37:6 71:3	notre 69:15	78:1 81:14 82:18
95:2 98:14 101:18	157:18,22 159:13	117:5 168:18,21	nous 64:22 65:1	87:11 114:6,17
104:3 105:11,15	159:18 162:11	170:17	69:15,16	116:7 128:4
106:13 119:7	163:10,17,21	needs 71:5 177:16	nouvelles 62:18	133:20 180:13
120:16 126:11	164:8,16 166:10	negatively 15:4	November 7:4	181:5 182:19
133:5 144:12	166:12,14,22	negotiation 50:20	144:22 149:5	183:8 184:13
149:7 152:3	167:1,3,13,15	52:7 53:1,5 118:4	161:8,11,20 162:7	objective 125:17,19
160:19 164:19	168:3,13,19 169:2	118:6	163:15	147:1,19 148:3,6
168:7 173:13	169:8,12,17	negotiations 53:14	number 9:3 63:18	148:6 149:1
moments 42:20	177:20 180:11,16	neither 89:14	72:22 73:3,18	objectives 60:20
165:5,14 179:11	180:19 183:7,11	167:21 187:9	74:22 75:9 84:14	72:21
money 15:19 16:3	183:21 184:10	never 38:22 44:13	104:15 111:21	obligatory 76:19
		48:17 95:18 96:5		

ESQUIRE DEPOSITION SERVICES

1-866-619-3925

JT-A-610